

Litigation phase: Case Development, Background Investigation and Case Administration

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
<u>Case Development, Background Investigation and Case Administ</u>		
10/8/2014 CLM Phone call with Brook Hill re: possible litigation	0.30 \$475.00/hr	142.50
10/9/2014 CLM Reviewed email from Hill w/ case details and documents	0.10 \$475.00/hr	NO CHARGE
10/16/2014 CLM Reviewed email from WLC Hill re: possible litigation	0.10 \$475.00/hr	47.50
10/21/2014 CLM Sent email to Hill re: potential case	0.10 \$475.00/hr	NO CHARGE
CLM Received email from Hill re: potential case	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from WCL Handley re: scheduling call	0.10 \$475.00/hr	NO CHARGE
10/23/2014 CLM Reviewed documents re: potential case before call with WLC Hill and Handley	0.40 \$475.00/hr	190.00

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	<u>Hrs/Rate</u>	<u>Amount</u>
10/23/2014		
CLM Sent email to Hill re: text in documents	0.10 \$475.00/hr	47.50
CLM Reviewed email from Hill re: text in documents	0.10 \$475.00/hr	NO CHARGE
CLM Meeting, telephonic, with WLC Hill and Handley re: Sergeant case	0.50 \$475.00/hr	237.50
CLM Reviewed email from Hill re: meeting w/ sergeant	0.10 \$475.00/hr	NO CHARGE
CLM Sent email to Hill, Handley re: meeting w/ sergeant	0.10 \$475.00/hr	47.50
10/27/2014		
CLM Reviewed email with attachment from Hill re: case development	0.10 \$475.00/hr	47.50
MVH Sent email to co-counsels meeting and case development	0.10 \$475.00/hr	47.50
MVH Reviewed email from Hill re: meeting	0.10 \$475.00/hr	NO CHARGE
10/28/2014		
CLM Meeting with Sergeant (1 hr), plus travel time of .4 hours each way	1.80 \$475.00/hr	855.00
11/10/2014		
CLM Sent email to Hill, Handley re: case development and communications	0.10 \$475.00/hr	47.50
CLM Reviewed email from Handley	0.10 \$475.00/hr	NO CHARGE
11/14/2014		
CLM Reviewed email with attachment from Hill re: case development	0.10 \$475.00/hr	47.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/14/2014	CLM reviewed email from Hill re: scheduling	0.10 \$475.00/hr	NO CHARGE
11/20/2014	CLM Sent email to Sarah Sloan re: scheduling	0.10 \$475.00/hr	47.50
11/25/2014	SS Scheduling 12.02.14 meeting w/ Mr. Sergeant	0.30 \$150.00/hr	NO CHARGE
12/1/2014	SS Preparation for 12.02.14 meeting with attorneys Mara Verheyden-Hilliard and Carl Messineo	0.30 \$150.00/hr	45.00
	CLM Reviewed documents, engagement letter	0.30 \$475.00/hr	142.50
	CLM Sent email to Hill with edits to engagement letter	0.10 \$475.00/hr	47.50
	MVH Preparation for 12.02.14 meeting with Carl Messineo and Sarah Sloan	0.30 \$475.00/hr	NO CHARGE
	CLM Preparation for 12.02.14 meeting with Mara Verheyden-Hilliard and Sarah Sloan	0.30 \$475.00/hr	142.50
	SS Preparation for 12.02.14 meeting	0.50 \$150.00/hr	75.00
12/2/2014	SS Meeting with client and paralegal Brooke Hill	2.50 \$150.00/hr	375.00
	SS Follow-up from 12.02.14 meeting w/ case management	0.50 \$150.00/hr	75.00
	CLM Meeting with Mr. Sargeant (1.3 hours) plus travel time (.3 x 2)	1.90 \$475.00/hr	902.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/16/2014			
CLM	Sent email to Handley re: next steps in case	0.10 \$475.00/hr	47.50
12/28/2014			
CLM	Drafted letter to Laurel City Solicitor, including review of underlying intake notes from WLC and online searches for articles / information pertaining to involved officer, Acol	3.80 \$475.00/hr	1,805.00
12/29/2014			
CLM	sent email to co-counsel w/ draft letter to City Solicitor	0.10 \$475.00/hr	47.50
CLM	Drafted letter to City Solicitor	1.50 \$475.00/hr	712.50
CLM	Reviewed email from Handley re: letter to city soliciter	0.10 \$475.00/hr	47.50
1/9/2015			
SS	Reviewed email from Handley	0.10 \$150.00/hr	NO CHARGE
1/12/2015			
SS	Sent email to Handley re: letter to city solicitor	0.10 \$150.00/hr	15.00
1/13/2015			
SS	Sending Letter to Laurel Solicitor	0.20 \$150.00/hr	NO CHARGE
SS	Sent email to Handley w/ final letter	0.10 \$150.00/hr	NO CHARGE
SS	Reviewed email from Handley	0.10 \$150.00/hr	NO CHARGE
2/4/2015			
CLM	Sent email to WLC Brook Hill, re: letter to Laurel City Solicitor	0.10 \$475.00/hr	47.50
CLM	Reviewed email from WLC Brook Hill, re: letter to Laurel City Solicitor	0.10 \$475.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/5/2015	SS Organizing documents, retrieve available information, files as requested by attorneys, in preparation for Sergeant complaint	3.70 \$150.00/hr	555.00
3/13/2015	MVH Research public records re: officers at issue, including meritorious service award	0.90 \$475.00/hr	427.50
4/27/2015	CLM Reviewed email from Risher re: his revisions	0.10 \$475.00/hr	NO CHARGE
5/15/2015	CLM Reviewed email from Handley re: scheduling	0.10 \$475.00/hr	NO CHARGE
5/21/2015	CLM Reviewed email from Handley re: scheduling	0.10 \$475.00/hr	NO CHARGE
5/26/2015	MVH Research, strip search incidents nationally, annotated facts, outcomes, including published reports, researched underlying pleadings where available	3.60 \$475.00/hr	1,710.00
	CLM Reviewed email from Handley re: scheduling	0.10 \$475.00/hr	NO CHARGE
5/27/2015	MVH sent e-mail to Corkery	0.10 \$475.00/hr	NO CHARGE
	CLM Sent email to co-counsels re: scheduling	0.10 \$475.00/hr	NO CHARGE
	CLM Reviewed email from Handley	0.10 \$475.00/hr	NO CHARGE
6/10/2015	CLM reviewed email from Handley	0.10 \$475.00/hr	NO CHARGE
	CLM Reviewed email from Risher	0.10 \$475.00/hr	NO CHARGE

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	<u>Hrs/Rate</u>	<u>Amount</u>
6/11/2015		
CLM Reviewed email from Hill re: scheduling w/ client	0.10 \$475.00/hr	NO CHARGE
SS Reviewed email from Hill	0.10 \$150.00/hr	NO CHARGE
SS Sent email to Hill	0.10 \$150.00/hr	NO CHARGE
SS Reviewed email from Hill re: scheduling	0.60 \$150.00/hr	NO CHARGE
6/12/2015		
SS Reviewed email from Hill re: scheduling	0.10 \$150.00/hr	NO CHARGE
CLM Reviewed email from Hill re: meeting	0.10 \$475.00/hr	NO CHARGE
6/16/2015		
CLM Reviewed email from Hill re: scheduling	0.10 \$475.00/hr	NO CHARGE
CLM Drafted email to WLC Hill re: meeting, fact checking w/ client	0.10 \$475.00/hr	47.50
SS Sent email to Hill re: scheduling	0.10 \$150.00/hr	NO CHARGE
SS Reviewed email from Hill re: scheduling	0.10 \$150.00/hr	NO CHARGE
6/17/2015		
CLM Reviewed email from Hill re: scheduling	0.10 \$475.00/hr	NO CHARGE
SS Reviewed email from Hill re: scheduling	0.10 \$150.00/hr	NO CHARGE

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	<u>Hrs/Rate</u>	<u>Amount</u>
7/9/2015 CLM Sent email to Handley re: edits and scheduling	0.10 \$475.00/hr	NO CHARGE
7/10/2015 CLM Reviewed email from Handley scheduling call	0.10 \$475.00/hr	NO CHARGE
CLM Sent email to Handley scheduling call	0.10 \$475.00/hr	NO CHARGE
7/14/2015 MVH Drafted email to Sarah Sloan scheduling	0.10 \$475.00/hr	NO CHARGE
MVH Drafted email to Carl Messineo scheduling	0.10 \$475.00/hr	NO CHARGE
7/15/2015 SS Sent email to Handley re: scheduling	0.10 \$150.00/hr	NO CHARGE
SS Reviewed email from Handley re: scheduling	0.10 \$150.00/hr	NO CHARGE
SS reviewed email from Handley re: scheduling	0.10 \$150.00/hr	NO CHARGE
7/16/2015 CLM Reviewed email from Hill re: communication w/ client	0.10 \$475.00/hr	NO CHARGE
7/17/2015 SS Sent email to Carl Messineo and Mara Verheyden-Hilliard re: scheduling	0.10 \$150.00/hr	NO CHARGE
7/27/2015 MVH Sent email to Handley re: scheduling	0.10 \$475.00/hr	NO CHARGE
MVH Sent e-mail to co-counels re: communication w/ client	0.10 \$475.00/hr	47.50

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	<u>Hrs/Rate</u>	<u>Amount</u>
7/27/2015		
MVH Reviewed email from Handley	0.10 \$475.00/hr	NO CHARGE
7/28/2015		
MVH Sent e-mail to Handley re: press	0.10 \$475.00/hr	NO CHARGE
MVH Reviewed email from Handley re: press	0.10 \$475.00/hr	NO CHARGE
CLM Sent email to co-counsels re: communication w/ client	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Handley re: phone conference w/ client	0.10 \$475.00/hr	NO CHARGE
MVH Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
MVH Sent email to co-counsels re: press	0.10 \$475.00/hr	NO CHARGE
MVH Sent email to Handley re: press	0.10 \$475.00/hr	NO CHARGE
MVH Sent email to Corkery re: press information	0.10 \$475.00/hr	NO CHARGE
7/29/2015		
MVH Reviewed email from Corkery re: press	0.10 \$475.00/hr	NO CHARGE
MVH Sent email to co-counsels re: case presentation and fact details	0.10 \$475.00/hr	47.50
MVH Sent email to co-counsels re: client update	0.10 \$475.00/hr	47.50

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	<u>Hrs/Rate</u>	<u>Amount</u>
7/29/2015		
MVH Reviewed email from Corkery re: press	0.10 \$475.00/hr	NO CHARGE
SS Sent email to attorneys re: client	0.10 \$150.00/hr	NO CHARGE
7/30/2015		
SS Sent email to attorneys re: communication w/ client	0.10 \$150.00/hr	NO CHARGE
8/3/2015		
CLM Reviewed email from Handley re: next steps	0.10 \$475.00/hr	NO CHARGE
8/12/2015		
CLM reviewed email from Risher	0.10 \$475.00/hr	NO CHARGE
8/24/2015		
CLM Sent email to co-counsels	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Handley	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
MVH Sent email to co-counsels	0.10 \$475.00/hr	NO CHARGE
CLM Sent email to co-counsels	0.10 \$475.00/hr	NO CHARGE
8/25/2015		
CLM Meeting by phone with co-counsels re: response to Opposing Counsel's letter	0.40 \$475.00/hr	190.00
8/26/2015		
CLM Reviewed email from Corkery re: discovery	0.10 \$475.00/hr	NO CHARGE

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	<u>Hrs/Rate</u>	<u>Amount</u>
10/15/2015		
MVH Sent email to co-counsels re: status	0.10 \$475.00/hr	NO CHARGE
MVH Reviewed email from Corkery re: karp MTD	0.10 \$475.00/hr	NO CHARGE
10/21/2015		
MVH Sent email to co-counsels re: communications w/ client	0.10 \$475.00/hr	NO CHARGE
10/27/2015		
MVH Drafted email to co-counsels re: scheduling	0.10 \$475.00/hr	NO CHARGE
CLM Drafted email to co-counsels re: scheduling	0.10 \$475.00/hr	NO CHARGE
10/28/2015		
CLM Reviewed email from Corkery re: scheduling	0.10 \$475.00/hr	NO CHARGE
11/2/2015		
CLM sent email to Corkery re: court hearing	0.10 \$475.00/hr	NO CHARGE
CLM sent email to Corkery re: court call	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Corkery re: scheduling	0.10 \$475.00/hr	NO CHARGE
11/3/2015		
CLM Sent email to Corkery	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
12/3/2015		
SS email to co-counsels re: call from client	0.10 \$150.00/hr	15.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/14/2015	CLM Reviewed email from Opposing Counsel	0.10 \$475.00/hr	NO CHARGE
12/15/2015	CLM e-mail to Sarah Sloan re: court rules	0.10 \$475.00/hr	NO CHARGE
	CLM Reviewed email from Sarah Sloan re: court rules	0.10 \$475.00/hr	NO CHARGE
12/18/2015	CLM Review email from Corkery re: next steps	0.10 \$475.00/hr	NO CHARGE
	CLM Review email sent from Corkery to Opposing Counsel	0.10 \$475.00/hr	NO CHARGE
	CLM Sent email to Corkery re: scheduling	0.10 \$475.00/hr	NO CHARGE
1/7/2016	CLM Sent email to Corkery scheduling meeting	0.10 \$475.00/hr	NO CHARGE
1/8/2016	CLM Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
1/15/2016	CLM Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
1/28/2016	CLM Sent email to Corkery	0.10 \$475.00/hr	NO CHARGE
4/1/2016	CLM Reviewed email from Corkery re: fees	0.10 \$475.00/hr	NO CHARGE
4/11/2016	CLM Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE

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	<u>Hrs/Rate</u>	<u>Amount</u>
4/13/2016		
CLM reviewed transmission of quarterly fee statement to Opposing Counsel	0.10 \$475.00/hr	NO CHARGE
CLM sent email to Corkery re: fees	0.10 \$475.00/hr	NO CHARGE
8/23/2016		
MVH PCJ attorneys conference w/ Carl Messineo re: court ruling and next steps furtherance of matter	0.50 \$475.00/hr	237.50
CLM PCJ attorneys conference w/ Mara Verheyden-Hilliard re: Sergeant ruling and case proceedings	0.50 \$475.00/hr	237.50
8/30/2016		
CLM emails w/ cocounsel and w/ Opposing Counsel re: scheduling call pursuant to court's order	0.20 \$475.00/hr	95.00
MVH emails w/ co-counsel, and emails w/ Opposing Counsel re: court order re: Rule 16 conference call	0.20 \$475.00/hr	95.00
8/31/2016		
SS Review of Docket, Electronic filing for case file management	0.30 \$150.00/hr	45.00
SS Preparation and filing of Notice of Appearance for Carl Messineo and Mara Verheyden-Hilliard	0.30 \$150.00/hr	45.00
MVH Reviewed Notice of Appearance and approved for filing	0.10 \$475.00/hr	NO CHARGE
MVH E-communication w/ cocounsel re: damages filing	0.10 \$475.00/hr	47.50
CLM E-communication w/ cocounsel re: damages filing	0.10 \$475.00/hr	47.50
CLM emails re: scheduling conference call w court	0.10 \$475.00/hr	NO CHARGE

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	<u>Hrs/Rate</u>	<u>Amount</u>
8/31/2016		
MVH emails w/ counsel re: scheduling R 16 conference call	0.10 \$475.00/hr	NO CHARGE
MVH Reviewed documents, scheduling and discovery order from court	0.20 \$475.00/hr	NO CHARGE
CLM Reviewed documents, scheduling order and discovery order from court	0.20 \$475.00/hr	95.00
9/1/2016		
MVH Meeting w/ Carl Messina re: damages filing, review related docs, brief discussion	0.10 \$475.00/hr	47.50
CLM Reviewed documents for damages filing, proposed suggested edits, brief meeting / Mara Verheyden-Hilliard related email discussion w/ Corkery	0.50 \$475.00/hr	237.50
9/6/2016		
SS Calendaring re: scheduling order and R 16 conf.	0.20 \$150.00/hr	NO CHARGE
9/12/2016		
CLM Reviewed email from Corkery re: new attorney Leah Watson	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Corkery re: scheduling	0.10 \$475.00/hr	NO CHARGE
CLM Sent email to Corkery re: discovery	0.10 \$475.00/hr	NO CHARGE
9/13/2016		
SS Reviewed paperless order from Court via ECF and updated calendar	0.10 \$150.00/hr	NO CHARGE
9/14/2016		
CLM Reviewed email from Corkery re: scheduling meeting	0.10 \$475.00/hr	NO CHARGE
9/19/2016		
SS Meeting with Carl Messina re: visit to location of incident	0.20 \$150.00/hr	30.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/19/2016			
CLM	Meeting with Sarah Sloan in advance of visit to location of incident, providing instructions	0.20 \$475.00/hr	95.00
SS	Meeting with Carl Messineo re: visit to location of incident in advance for instructions	0.20 \$150.00/hr	30.00
SS	Follow-up from visit to location of incident, review of photographs, providing photographs to attorneys and paralegal, review of notes,	0.40 \$150.00/hr	60.00
SS	Visit to location of incident, collected information on area of strip search, public view, doors of CVS, gas station, photographed area,	2.50 \$150.00/hr	375.00
SS	Preparation for visit to location of incident , materials to bring, schematic information	0.30 \$150.00/hr	45.00
SS	Reviewed email from paralegal Samantha Weaver in follow-up to visit to location of incident	0.10 \$150.00/hr	15.00
CLM	Meeting with Sarah Sloan re: her visit to location of incident	0.20 \$475.00/hr	95.00
9/21/2016			
SS	Phone call to plaintiff Allan Sergeant to reschedule meeting	0.10 \$150.00/hr	15.00
9/23/2016			
SS	Reviewed email from paralegal Samantha Weaver in follow-up to visit to location of incident	0.10 \$150.00/hr	15.00
9/27/2016			
MVH	Reviewed email from Corkery re: scheduling	0.10 \$475.00/hr	NO CHARGE
SS	Reviewed email from paralegal Samantha Weaver in follow-up to visit to location of incident	0.10 \$150.00/hr	15.00
9/28/2016			
CLM	Reviewed documents, letter from Opposing Counsel	0.10 \$475.00/hr	47.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/28/2016	MVH Reviewed documents, letter from Opposing Counsel	0.10 \$475.00/hr	47.50
9/29/2016	SS Reviewed emails among co counsel re: research on garden variety emotional distress	0.10 \$150.00/hr	NO CHARGE
10/11/2016	SS Reviewed email exchange between MVH and Dennis	0.10 \$150.00/hr	NO CHARGE
	SS Search and review of public records regarding client	0.30 \$150.00/hr	45.00
	MVH Reviewed email from Corkery to Karp	0.10 \$475.00/hr	NO CHARGE
	CLM Reviewed email from Corkery to Karp	0.10 \$475.00/hr	NO CHARGE
	MVH reviewed email from Corkery re: communication w/ client	0.10 \$475.00/hr	47.50
	MVH Sent email to Corkery	0.10 \$475.00/hr	NO CHARGE
	CLM Reviewed email from Mara Verheyden-Hilliard to Corkery	0.10 \$475.00/hr	NO CHARGE
10/21/2016	CLM Research, filings including amici in Florence Sup Ct strip search case	0.80 \$475.00/hr	380.00
	CLM Research, 4th Cir standards on strip search, including Amaechi v. West, 237 F.3d 356, U.S. v. Edwards, 666 F.3d 877, among other Fourth Circuit cases	1.60 \$475.00/hr	760.00
10/24/2016	CLM Phone call with Mara Verheyden-Hilliard re: draft letter to Karp, as well as review email from Mara Verheyden-Hilliard re: same	0.10 \$475.00/hr	47.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/30/2016			
MVH	Discussed appearance of ongoing trauma, PTSD, propriety of expert w/ cocounsel	0.50 \$475.00/hr	237.50
	CLM Discussed appearance of ongoing trauma, PTSD, propriety of expert w/ cocounsel	0.50 \$475.00/hr	NO CHARGE
11/1/2016			
CLM	Legal Research, discoverability of police investigative reports, including Martin v Conner, 287 F.R.D. 348, Bellamy-Bey v. Baltimore Police Dept, 237 F.R.D., 391, additional fourth circuit cases with related key notes	1.90 \$475.00/hr	902.50
	CLM Reviewed documents, two items of correspondence from Dan Karp and related email from Corkery	0.20 \$475.00/hr	95.00
11/2/2016			
CLM	Legal Research, Scope and Duration of Consent to Search	1.50 \$475.00/hr	712.50
12/13/2016			
MVH	Research case law on consent to search, express consent, unequivocal and explicit, requirements for and lack thereof - based on Acol's defense claim that client consented to strip search, including Harvey, Karwicki, Grey ex rel etc.	2.90 \$475.00/hr	1,377.50
12/14/2016			
MVH	email discussion on next steps in discovery and case	0.40 \$475.00/hr	NO CHARGE
	MVH Research into strip search, in particular monell liability	1.30 \$475.00/hr	NO CHARGE
	SS Telephone call w counsel about case details, next steps and follow-up email discussion	0.80 \$150.00/hr	120.00
	MVH Research, additional cases, 4th circuit and national where claim of consent to strip search, or lesser search, offered as defense	4.30 \$475.00/hr	2,042.50
1/3/2017			
CLM	Reviewed email from MVH	0.10 \$475.00/hr	NO CHARGE

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	<u>Hrs/Rate</u>	<u>Amount</u>
1/3/2017		
CLM Reviewed email from Leah Watson	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
CLM reviewed email from MVH	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from MVH	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed e-mail from Corkery to Karp	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
1/4/2017		
SS Review of email from Dennis Corkery to Karp	0.10 \$150.00/hr	NO CHARGE
CLM Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
1/6/2017		
CLM Reviewed email from Samantha Weaver	0.10 \$475.00/hr	NO CHARGE
1/9/2017		
CLM Meeting by telephone with Leah Watson	0.30 \$475.00/hr	142.50
CLM Reviewed email from Leah Watson re: client's deposition	0.10 \$475.00/hr	47.50

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	<u>Hrs/Rate</u>	<u>Amount</u>
1/10/2017		
CLM Reviewed email from Mara Verheyden-Hilliard to Corkery	0.10 \$475.00/hr	NO CHARGE
MVH Reviewed correspondence with Opposing Counsel and email to cocounsel regarding same	0.10 \$475.00/hr	NO CHARGE
1/12/2017		
CLM reviewed edits to proposed letter to Opposing Counsel from Corkey	0.10 \$475.00/hr	47.50
SS Review of emails between attorneys drafting correspondance to Karp	0.10 \$150.00/hr	NO CHARGE
SS Review of correspondance from Karp	0.10 \$150.00/hr	NO CHARGE
1/13/2017		
CLM E-mail to Corkery re: discovery matters for premotion conf	0.10 \$475.00/hr	47.50
CLM Reviewed email from Corkery re: draft letter to Court	0.10 \$475.00/hr	NO CHARGE
1/17/2017		
SS Review and filing of Karp's responses filed through ECF (Nos. 50 and 51)	0.10 \$150.00/hr	NO CHARGE
1/18/2017		
CLM E-mail to expert	0.10 \$475.00/hr	NO CHARGE
1/19/2017		
SS Review of ECF Nos. 52 and 53, and re-calendaring	0.10 \$150.00/hr	NO CHARGE
CLM Phone call, left voice mail for Corkery	0.10 \$475.00/hr	NO CHARGE
CLM Drafted email to Corkery	0.10 \$475.00/hr	NO CHARGE

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	<u>Hrs/Rate</u>	<u>Amount</u>
1/19/2017 CLM Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
1/23/2017 CLM Review e-mail from Corkery	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
1/24/2017 CLM Reviewed email from Leah Watson	0.10 \$475.00/hr	NO CHARGE
1/25/2017 CLM Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
CLM Review email from Corkery	0.10 \$475.00/hr	NO CHARGE
SS Review of emails between attorneys about assignment of tasks	0.10 \$150.00/hr	NO CHARGE
CLM Drafted Response to post-hearing Action Item list from Dennis	0.20 \$475.00/hr	95.00
SS Review of email from Leah Watson to Karp	0.10 \$150.00/hr	NO CHARGE
1/26/2017 CLM reviewed email from Corkery to Sarah Sloan	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Watson to Sarah Sloan	0.10 \$475.00/hr	NO CHARGE
CLM Meeting with Mara Verheyden-Hilliard re: tax returns and impeachment issues asserted by Opposing Counsel	0.30 \$475.00/hr	142.50

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	<u>Hrs/Rate</u>	<u>Amount</u>
1/27/2017		
SS Sent email to Weaver	0.10 \$150.00/hr	NO CHARGE
CLM Reviewed email from Samantha Weaver	0.10 \$475.00/hr	NO CHARGE
2/3/2017		
SS Communication with attorneys reporting communication with client	0.20 \$150.00/hr	30.00
CLM reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Mara Verheyden-Hilliard re: communication w/ client	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Mara Verheyden-Hilliard to Carl Messineo and Sarah Sloan	0.10 \$475.00/hr	NO CHARGE
2/7/2017		
SS Review of correspondance from Karp	0.10 \$150.00/hr	NO CHARGE
CLM Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
2/8/2017		
CLM Reviewed email from Mara Verheyden-Hilliard to Corkery	0.10 \$475.00/hr	NO CHARGE
SS Provide attorney with information relevant to communication to client	0.10 \$150.00/hr	NO CHARGE
MVH Drafted letter to client re: outstanding matters, emailed draft to Corkery	0.40 \$475.00/hr	190.00
SS Review of written communication to client	0.20 \$150.00/hr	NO CHARGE

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	<u>Hrs/Rate</u>	<u>Amount</u>
2/8/2017		
SS Communication with client by phone re: tax and other issues raised by Opposing Counsel	0.60 \$150.00/hr	90.00
CLM reviewed email from Mara Verheyden-Hilliard to Corkery	0.10 \$475.00/hr	NO CHARGE
CLM reviewed draft letter to client, forwarded by MVH	0.20 \$475.00/hr	NO CHARGE
CLM Reviewed letter to client, and sent email to Mara Verheyden-Hilliard with proposed addition	0.20 \$475.00/hr	95.00
CLM Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed letter from Corkery re letter to client	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Corkery to Mara Verheyden-Hilliard	0.10 \$475.00/hr	NO CHARGE
2/10/2017		
CLM Reviewed documents, scheduling order from Court	0.10 \$475.00/hr	NO CHARGE
2/15/2017		
SS Review and file correspondance from Karp	0.10 \$150.00/hr	NO CHARGE
2/16/2017		
SS Scheduling meeting with attorneys and client	0.10 \$150.00/hr	NO CHARGE
2/23/2017		
CLM Reviewed email from Corkery to Opposing Counsel	0.10 \$475.00/hr	NO CHARGE
3/1/2017		
SS Review and filing of ECF No. 61 (Leah Watson withdraw)	0.10 \$150.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/2/2017			
SS	Review of ECF No. 60 (Order granting Leah Watson withdraw)	0.10 \$150.00/hr	NO CHARGE
3/3/2017			
MVH	Reviewed documents, Corkery drafts, bill of costs and consent motions, minor edits and email same	0.30 \$475.00/hr	142.50
3/21/2017			
MVH	E-communications w/ Corkery re: judgment entered and next steps	0.20 \$475.00/hr	95.00
3/23/2017			
MVH	E-communications w/ Corkery re: communications w/ client	0.10 \$475.00/hr	47.50
	No Charge	19.80	\$7,877.50
	Billable Fees	50.80	\$19,515.00

Litigation phase: Pleadings

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
	<u>Pleadings</u>		
2/4/2015			
CLM	Reviewed email from Matt Handley, re: division of labor on complaint drafting	0.10 \$475.00/hr	47.50
CLM	Sent email to Handley, re: division of labor on complaint drafting	0.10 \$475.00/hr	47.50
2/11/2015			
CLM	Sent email to co-counsel, re: complaint	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed email from WLC Risher re: rough draft complaint and substance	0.10 \$475.00/hr	47.50
CLM	Reviewed email from Handley, complaint drafting status discussion and respective organizational areas of expertise	0.10 \$475.00/hr	47.50
2/23/2015			
CLM	Reviewed email from WLC Corkery, editing comments re: complaint and question re: causes of action	0.10 \$475.00/hr	47.50
CLM	Reviewed email from Risher, discussion re: causes of action, limitations period	0.10 \$475.00/hr	47.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/3/2015			
CLM	Reviewed email from Hill, status of complaint drafting and editing	0.10 \$475.00/hr	NO CHARGE
3/4/2015			
CLM	Sent email Hill, co-counsels re: status of complaint drafting and editing	0.10 \$475.00/hr	NO CHARGE
3/5/2015			
CLM	Reviewed documents, initial review of early rough draft of complaint prepared by WLC fellow Conrad Risher, mark up	0.70 \$475.00/hr	332.50
	SS Meeting with CLM and Mara Verheyden-Hilliard re: Sergeant complaint	0.30 \$150.00/hr	45.00
	MVH Meeting with Sarah Sloan and Carl Messineo re: Sergeant complaint and assessment of materials and evidence	0.30 \$475.00/hr	NO CHARGE
	CLM Meeting with Sarah Sloan, Mara Verheyden-Hilliard re: assessment of materials and evidence for draft and editing of complaint	0.30 \$475.00/hr	142.50
3/6/2015			
CLM	Reviewed email from Risher further discussion re: SOLs and 1983	0.10 \$475.00/hr	47.50
	CLM Sent email to Risher, w information re: constitutional torts	0.10 \$475.00/hr	47.50
	CLM Reviewed e-mail from Risher re: limitations periods	0.10 \$475.00/hr	47.50
3/7/2015			
CLM	Reviewed documents, case file materials, annotated and delineated in preparation for drafting / editing complaint	2.80 \$475.00/hr	1,330.00
	CLM Legal Research, including treatise and case law review as relates to the violation of clearly established law in connection with the strip search element of the violation	3.50 \$475.00/hr	1,662.50
3/11/2015			
CLM	Drafted/edited complaint, substantial writing of complaint fact section; including review of current state of the law ruling with respect to Terry stops, establishment of probable cause and articulable reasonable suspicion at multiple stages of underlying event	7.80 \$475.00/hr	3,705.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
3/11/2015			
CLM	Sent email to Risher re: complaint drafting	0.10 \$475.00/hr	NO CHARGE
	CLM Reviewed email from Risher re: strip searches and case law	0.10 \$475.00/hr	47.50
	CLM Phone call w/ Risher re: complaint drafting details	0.10 \$475.00/hr	47.50
3/13/2015			
CLM	Received e-mail from Risher re: complaint	0.10 \$475.00/hr	NO CHARGE
3/14/2015			
CLM	Drafted/edited complaint, focus on fact section	3.70 \$475.00/hr	1,757.50
3/15/2015			
CLM	Drafted/edited complaint, fact section, clearly established law section, including review of cases pertaining to Iqbal and Twombly fact pleading requirements applied in Fourth Amendment context and in motions to dismiss context	6.30 \$475.00/hr	2,992.50
	MVH Drafted / edited complaint, reviewed and revised complaint, annotated w/ suggested areas of edit	3.70 \$475.00/hr	1,757.50
3/16/2015			
CLM	Drafted / edited complaint, facts, clearly established law and 4th amendment sections, including related case law review applying assertions of qualified immunity in 4th Am search and stop-and-frisk or Terry stop context	5.80 \$475.00/hr	2,755.00
	CLM Sent email to Risher re: complaint edits and writing	0.10 \$475.00/hr	NO CHARGE
3/19/2015			
CLM	Sent email to Risher, state law claims, Iqbal standards	0.10 \$475.00/hr	47.50
	CLM Sent email to Risher, Monell liability issues	0.10 \$475.00/hr	NO CHARGE
	CLM Received email from Risher	0.10 \$475.00/hr	NO CHARGE

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	<u>Hrs/Rate</u>	<u>Amount</u>
3/24/2015		
CLM Drafted new opening section to complaint	3.90 \$475.00/hr	1,852.50
CLM Received email from Risher re: Monell	0.10 \$475.00/hr	NO CHARGE
CLM Phone call with Risher re: complaint	0.30 \$475.00/hr	142.50
CLM Sent email to Risher re: followup on discussion re: factual detail, Iqbal / Twombly standards	0.10 \$475.00/hr	47.50
CLM Received email from Risher re: Monell	0.10 \$475.00/hr	NO CHARGE
3/25/2015		
CLM Email sent to Risher re: Monell	0.10 \$475.00/hr	NO CHARGE
3/30/2015		
CLM Received email from Risher re: latest draft	0.10 \$475.00/hr	NO CHARGE
CLM Sent email to Risher re: complaint	0.10 \$475.00/hr	NO CHARGE
3/31/2015		
CLM Reviewed documents, new draft of portions of complaint that WLC drafting, notating for edits and add'l work	2.00 \$475.00/hr	950.00
4/8/2015		
CLM Drafted email re: complaint to co-counsels	0.10 \$475.00/hr	47.50
CLM Reviewed email from Handley, meeting re: complaint	0.10 \$475.00/hr	NO CHARGE
CLM Drafted email to co-counsels, meeting re: complaint	0.10 \$475.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/8/2015			
CLM	reviewed email from Risher, meeting re: complaint	0.10 \$475.00/hr	NO CHARGE
	CLM Reviewed email from WLC David Cynamon	0.10 \$475.00/hr	NO CHARGE
4/14/2015			
CLM	Meeting at WLC, travel time	0.60 \$475.00/hr	285.00
	CLM Meeting with co-counsels at Washington Lawyers Committee Offices (with M. Handley, D. Cynamon, C. Rischer and D. Corkery present)	1.30 \$475.00/hr	617.50
4/27/2015			
CLM	Reviewed email from Risher re: complaint status	0.10 \$475.00/hr	NO CHARGE
	CLM Drafted email to co-counsels re: next step action items	0.10 \$475.00/hr	47.50
5/15/2015			
CLM	Reviewed email from Handley re: complaint status	0.10 \$475.00/hr	NO CHARGE
5/21/2015			
CLM	Sent email to co-counsels re: complaint status	0.10 \$475.00/hr	NO CHARGE
	CLM Sent email to Handley re: complaint status complaint status	0.10 \$475.00/hr	NO CHARGE
	CLM Sent email to co-counsels re: complaint meeting	0.10 \$475.00/hr	NO CHARGE
5/27/2015			
CLM	Phone conference w/ Mara Verheyden-Hilliard Matt Handley, Dennis Corkery, Conrad re: complaint structure, editing timing of filing	0.50 \$475.00/hr	237.50
	MVH Phone conference w/ Carl Messineo Matt Handley, Dennis Corkery, Conrad re: complaint structure, editing timing of filing	0.50 \$475.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
6/1/2015			
CLM	Drafted / edited complaint from Risher's revisions, added in prior edits	5.50 \$475.00/hr	NO CHARGE
6/3/2015			
CLM	Drafted / edited complaint from Risher's revisions that inadvertently left out prior edited version	4.00 \$475.00/hr	NO CHARGE
6/9/2015			
CLM	Drafted / edited complaint	4.80 \$475.00/hr	NO CHARGE
6/10/2015			
MVH	Drafted / edited Complaint nearing final	3.20 \$475.00/hr	1,520.00
	SS Sent email to co-counsels re: status of complaint, meeting w/ client	0.10 \$150.00/hr	15.00
6/11/2015			
CLM	Drafted / edited Complaint near final	3.70 \$475.00/hr	1,757.50
	CLM Drafted email to co-counsels re: substantial reincorporation of prior edits	0.10 \$475.00/hr	NO CHARGE
	SS Preparation of draft Complaint, formatting	1.00 \$150.00/hr	NO CHARGE
6/18/2015			
SS	Preparation for 06.19.15 meeting with client, information to go over	0.50 \$150.00/hr	75.00
	SS Preparation for 06.19.15 meeting w client, reviewed complaint and underlying material, prepared areas of discussion w/ client	0.50 \$150.00/hr	75.00
	CLM Preparation for Sarah Sloan 06.19.15 meeting with client key points to go over	0.50 \$475.00/hr	237.50
	MVH Preparation for Sarah Sloan 06.19.15 meeting with client, key points to go over	0.50 \$475.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
6/19/2015			
SS	Meeting with client at WLC, review complaint, fact checking, including .4 travel	3.50 \$150.00/hr	525.00
	SS Created annotated complaint for attorneys based on meeting w/ client	1.70 \$150.00/hr	255.00
6/22/2015			
CLM	Follow-up from Sarah Sloan 06.19.15 meeting w/ client with Mara Verheyden-Hilliard and Sarah Sloan	0.50 \$475.00/hr	237.50
	MVH Follow-up from 06.19.15 meeting with Sarah Sloan and Carl Messineo	0.50 \$475.00/hr	NO CHARGE
	SS Follow-up from 06.19.15 meeting w/ client with attorneys Mara Verheyden-Hilliard, Carl Messineo	0.50 \$150.00/hr	NO CHARGE
	SS Follow-up from 06.19.15 meeting w/ client	0.50 \$150.00/hr	NO CHARGE
6/30/2015			
CLM	Sent email to Handley re: complaint revisions	0.10 \$475.00/hr	NO CHARGE
	CLM sent e-mail to co-counsels re: complaint revisions	0.10 \$475.00/hr	NO CHARGE
	CLM Drafted / edited Complaint , minor	1.20 \$475.00/hr	NO CHARGE
7/6/2015			
CLM	Review email from Handley, edits, discussion re: cause of action	0.10 \$475.00/hr	47.50
7/13/2015			
CLM	Drafted/reviewed complaint for final detailed edits	1.70 \$475.00/hr	807.50
	MVH Phone conference w/ Matt Handley, Carl Messineo, Conrad, discuss posture of case	0.70 \$475.00/hr	NO CHARGE

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	<u>Hrs/Rate</u>	<u>Amount</u>
7/13/2015		
CLM Phone conference w/ Matt Handley, Mara Verheyden-Hilliard , Conrad, discuss posture of case and available evidence re: claims	0.70 \$475.00/hr	332.50
CLM Reviewed email from Handley scheduling and proofing	0.10 \$475.00/hr	NO CHARGE
7/15/2015		
SS Sent email to co-counsels, re: discussion w/ client re: complaint	0.10 \$150.00/hr	15.00
7/22/2015		
CLM Meeting at WLC for final discussion re: complaint, meeting with client	1.00 \$475.00/hr	475.00
MVH Sent email to Handley re: complaint filing	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Handley re: date for filing	0.10 \$475.00/hr	NO CHARGE
MVH Meeting at WLC w/ attorneys and client re: complaint	1.00 \$475.00/hr	NO CHARGE
7/24/2015		
MVH Reviewed email from Handley re: complaint	0.10 \$475.00/hr	NO CHARGE
7/27/2015		
MVH Reviewed email from Handley re: complaint	0.10 \$475.00/hr	NO CHARGE
MVH Sent email to co-counsels, drafted response to key points re: case presentation	0.20 \$475.00/hr	95.00
7/28/2015		
CLM phone call w/ client re: complaint	0.40 \$475.00/hr	190.00
CLM Sent email to Client re: filing of complaint	0.10 \$475.00/hr	47.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/28/2015			
CLM	Reviewed email from Handley re: complaint filing	0.10 \$475.00/hr	NO CHARGE
	CLM Reviewed email from Handley re: press	0.10 \$475.00/hr	NO CHARGE
7/29/2015			
MVH	Meeting w/ client re: filing of complaint	1.30 \$475.00/hr	617.50
	MVH Sent email to co-counsels re: most recent complaint version	0.10 \$475.00/hr	47.50
7/30/2015			
MVH	Meeting w/client re: filing of complaint	0.70 \$475.00/hr	332.50
	MVH Reviewed email from Corkery, w filed complaint	0.10 \$475.00/hr	47.50
8/3/2015			
CLM	reviewed email from Corkery service issues	0.10 \$475.00/hr	NO CHARGE
8/24/2015			
CLM	Reviewed correspondence from Karp to Corkery re: service and acceptance of complaint and intent to file MTD etc.	0.10 \$475.00/hr	47.50
	CLM Reviewed email from Corkery re: due date of answer and other matters	0.10 \$475.00/hr	NO CHARGE
8/25/2015			
CLM	reviewed email from Corkery to Opposing Counsel re: responsive pleading	0.10 \$475.00/hr	NO CHARGE
8/26/2015			
CLM	reviewed email from Opposing Counsel re: service	0.10 \$475.00/hr	NO CHARGE
9/8/2015			
CLM	Reviewed email from Corkery to Opposing Counsel	0.10 \$475.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/8/2015			
CLM	Reviewed email from Opposing Counsel re: waiver for acol	0.10 \$475.00/hr	NO CHARGE
9/23/2015			
CLM	Reviewed email from Corkery re: Doe defendant	0.10 \$475.00/hr	NO CHARGE
9/24/2015			
CLM	Sent email to Corkery, co-counsel re: identification of Doe defendant	0.10 \$475.00/hr	47.50
11/5/2015			
CLM	Reviewed email from Opposing Counsel re: amended complaint	0.10 \$475.00/hr	47.50
11/23/2015			
CLM	reviewed email from Corkery re: amended complaint	0.10 \$475.00/hr	NO CHARGE
11/30/2015			
CLM	Reviewed email from Corkery re: amended complaint	0.10 \$475.00/hr	NO CHARGE
CLM	sent email to co-counsels re: amended complaint	0.10 \$475.00/hr	NO CHARGE
12/1/2015			
CLM	review of proposed amended complaint and telephone call with co-counsels re: edits to same	0.90 \$475.00/hr	427.50
8/31/2016			
CLM	Reviewed email from Corkery, and responded via email re: punitive damages	0.10 \$475.00/hr	47.50
10/14/2016			
MVH	Reviewed documents, ECF Notice by Sergeant of Second Amended Complaint filed by DC	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed documents, email from Corkery enclosing DC's edits to Second Amended Complaint, Letter regarding SAC	0.10 \$475.00/hr	47.50
MVH	Reviewed documents, email from Corkery, DC's edits to Second Amended Complaint, Letter regarding SAC	0.30 \$475.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/14/2016			
CLM	Reviewed documents, email from Corkery to Karp re: amending complaint to substitute for Doe defendant	0.10 \$475.00/hr	NO CHARGE
MVH	Reviewed documents, email from Corkery to Karp re: amending complaint to substitute for Doe defendant	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed documents, ECF Notice by Sergeant of Second Amended Complaint filed by DC	0.10 \$475.00/hr	47.50
10/17/2016			
MVH	Reviewed documents, email from DC re: misspelling by defendant of co-defendant's name	0.10 \$475.00/hr	47.50
CLM	Reviewed email from DC re: pleading	0.10 \$475.00/hr	NO CHARGE
MVH	Reviewed email from DC re: Houck summons	0.10 \$475.00/hr	NO CHARGE
MVH	sent email to DC re: discovery edits	0.10 \$475.00/hr	NO CHARGE
12/14/2016			
MVH	Meeting with Carl Messineo re: municipal claims	1.00 \$475.00/hr	NO CHARGE
CLM	Meeting with Mara Verheyden-Hilliard re: municipal claims	1.00 \$475.00/hr	NO CHARGE
12/16/2016			
CLM	Drafted initial version of letter re: amending to add municipal claims	1.50 \$475.00/hr	NO CHARGE
1/4/2017			
SS	Formatting and transmission of letter from CM to Karp	0.30 \$150.00/hr	NO CHARGE
CLM	Drafted letter to Opposing Counsel requesting consent for leave to amend the complaint to add the municipality as a defendant	1.00 \$475.00/hr	NO CHARGE

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	<u>Hrs/Rate</u>	<u>Amount</u>
1/4/2017		
MVH Meeting with Carl Messineo regarding request to amend complaint	0.20 \$475.00/hr	NO CHARGE
CLM Meeting with Mara Verheyden-Hilliard re: request to amend complaint	0.20 \$475.00/hr	NO CHARGE
MVH Reviewed and edited letter from Carl Messineo to Opposing Counsel re: request to amend complaint	0.30 \$475.00/hr	NO CHARGE
1/5/2017		
CLM Reviewed email from Sarah Sloan re: amending complaint	0.10 \$475.00/hr	NO CHARGE
SS drafted email to Carl Messineo re: documents for amending complaint	0.10 \$150.00/hr	NO CHARGE
SS Preparation of requested documents for amended complaint	0.30 \$150.00/hr	NO CHARGE
SS Meeting with Carl Messineo re: tasks related to collection of information and documents related to amendment of complaint	0.30 \$150.00/hr	NO CHARGE
CLM Meeting with Sarah Sloan re: documents related to amendment of complaint	0.30 \$475.00/hr	NO CHARGE
CLM Reviewed email from Opposing Counsel	0.10 \$475.00/hr	NO CHARGE
SS Assist attorney in locating key supporting documents for draft third amended complaint	0.10 \$150.00/hr	NO CHARGE
1/6/2017		
SS Preparation, reviewed case file for materials related to amendment of complaint	0.30 \$150.00/hr	NO CHARGE
1/9/2017		
CLM Drafted Third Amended Complaint	2.50 \$475.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/9/2017			
SS	Preparation of redline comparison between Second Amended Complaint and proposed Third Amended Complaint	0.20 \$150.00/hr	NO CHARGE
SS	Preparation of comparison between SAC and TAC	0.40 \$150.00/hr	NO CHARGE
CLM	Research, case law re: municipal liability claims, failure to train, Sec 1983, in Fourth Circuit and District Courts	1.20 \$475.00/hr	NO CHARGE
1/10/2017			
SS	Finalization of comparison between SAC and TAC for transmission to Karp	0.50 \$150.00/hr	NO CHARGE
CLM	Drafted final revisions to Third Amended Complaint	0.80 \$475.00/hr	NO CHARGE
1/17/2017			
CLM	Reviewed documents, Opposing Counsel letter to court re: leave to amend	0.20 \$475.00/hr	NO CHARGE
		No Charge	39.00
		Billable Fees	67.30
			\$17,062.50
			\$29,790.00

Litigation phase: Interrogatories, Document Production and Written Discovery

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
	<u>Interrogatories, Document Production and Written Discovery</u>		
7/30/2015			
MVH	Review Laurel public statements and claims regarding strip search	0.40 \$475.00/hr	190.00
9/8/2015			
CLM	Begin drafting outline of discovery areas, specifically pertinent to case law on strip searches, related research on strip search case law fact patterns (relating to both deposition and written discovery subject matter)	4.50 \$475.00/hr	2,137.50
9/9/2016			
CLM	Begin drafting first rounds of discovery requests, review related case documents, and defendants Answer denying all key allegations including strip search	5.30 \$475.00/hr	2,517.50
CLM	Meeting w/ Mara Verheyden-Hilliard re: propounding discovery and issues in light of Acol's complete denial of strip search and other factual matters in Answer filed with court necessitating further development of areas of proof in discovery	0.80 \$475.00/hr	380.00
MVH	Meeting w/ Carl Messineo re: propounding discovery and issues in light of Acol's complete denial of strip search and other factual matters in Answer filed with court necessitating further development of areas of proof in discovery	0.80 \$475.00/hr	380.00

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	<u>Hrs/Rate</u>	<u>Amount</u>
9/12/2016		
CLM Sent email to co-counsels re: draft discovery requests and discussion	0.10 \$475.00/hr	47.50
CLM Phone call with co-counsel (Mara Verheyden-Hilliard included) re: discovery	0.10 \$475.00/hr	47.50
MVH Phone call w/ co counsel at WLC and Carl Messineo re: discovery	0.10 \$475.00/hr	47.50
MVH Reviewed proposed discovery requests, suggested edits	0.50 \$475.00/hr	237.50
CLM Sent follow up email to co Counsel re: draft discovery requests	0.10 \$475.00/hr	NO CHARGE
CLM Drafted first set of interrogatories and Requests for Production (RFPs); reviewed underlying case records (pleadings, investigation related material) and defendants denials in Answer	4.20 \$475.00/hr	1,995.00
9/13/2016		
SS Preparation of hard copies of discovery requests, transmission via mail	0.40 \$150.00/hr	NO CHARGE
CLM Reviewed e-mail with attachments from co-counsel re: discovery	0.10 \$475.00/hr	47.50
SS Receipt of discovery requests from opposing counsel via email, filing and initial review	0.20 \$150.00/hr	NO CHARGE
CLM Instructions to paralegal Sarah Sloan re: final edits and transmission of discovery requests	0.20 \$475.00/hr	95.00
SS Finalizing and preparation of discovery requests, transmission to opposing counsel via email	0.50 \$150.00/hr	75.00
9/14/2016		
MVH Reviewed documents, discovery requests interrogatories and Request for Production of Documents from Opposing Counsel to plaintiff, annotate w/ initial information, for drafting responses, detail areas for paralegal work, questions re: objections, reviewed related documents	2.40 \$475.00/hr	1,140.00

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	<u>Hrs/Rate</u>	<u>Amount</u>
9/14/2016		
MVH E-communications w/ co counsel re: discovery next steps	0.10 \$475.00/hr	47.50
CLM Drafted email to co-counsel re: scheduling meeting re: discovery	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed documents, email from co-counsel re: responses to discovery against plaintiff	0.10 \$475.00/hr	47.50
9/15/2016		
CLM Phone conference w/ cocounsel re: discovery, Mara Verheyden-Hilliard, Corkery, Watson	0.50 \$475.00/hr	NO CHARGE
MVH Phone conference w/ cocounsel, Corkery, Carl Messineo Watson re: discovery responses	0.50 \$475.00/hr	237.50
SS Meeting with Mara Verheyden-Hilliard re: discovery requests and information for paralegals to obtain	0.50 \$150.00/hr	75.00
SS Reviewed e-communication from paralegal Samantha Weaver re: written discovery responses	0.10 \$150.00/hr	15.00
SS Phone call to WLC paralegal Samantha Weaver	0.10 \$150.00/hr	NO CHARGE
SS Reply to e-communication from Dennis Corkery re: discovery	0.10 \$150.00/hr	15.00
SS Review of e-communication from Dennis Corkery re: discovery	0.10 \$150.00/hr	NO CHARGE
CLM Reviewed email from Corkery to Karp re: ESI meet and confer	0.10 \$475.00/hr	NO CHARGE
MVH E-communications w/ co counsel re: discovery responses, drafting and obtaining information	0.20 \$475.00/hr	95.00

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	<u>Hrs/Rate</u>	<u>Amount</u>
9/15/2016		
MVH Meeting w/ paralegal Sarah Sloan re: discovery responses, information that needs to be obtained	0.50 \$475.00/hr	237.50
MVH Reviewed documents, email from paralegal Sarah Sloan re: discovery responses and available information	0.10 \$475.00/hr	47.50
MVH emails w/ cocounsel and Opposing Counsel re: electronic discovery	0.10 \$475.00/hr	47.50
CLM emails w/ co counsel re: discovery matters and plan	0.20 \$475.00/hr	95.00
9/16/2016		
SS Phone call with paralegal Samantha Weaver re trip to CVS, meeting with plaintiff Allan Sergeant, coordinating discovery tasks	0.20 \$150.00/hr	30.00
SS Reviewed reply email from paralegal Samantha Weaver re: schedule for meetings and joint discovery tasks	0.10 \$150.00/hr	NO CHARGE
MVH Drafting discovery responses, review available documents re: initial responsive information	3.40 \$475.00/hr	1,615.00
CLM Email from Sarah Sloan re: plan for carrying out discovery tasks	0.10 \$475.00/hr	47.50
MVH Email from Sarah Sloan re: plan for carrying out discovery tasks	0.10 \$475.00/hr	47.50
SS Email to Mara Verheyden-Hilliard and Carl Messineo re: plan for carrying out discovery tasks	0.10 \$150.00/hr	15.00
SS E-communication sent to plaintiff Allan Sergeant re: discovery requests and meeting	0.20 \$150.00/hr	30.00
SS Phone call to plaintiff Allan Sergeant to schedule meeting about discovery responses and brief discussion	0.20 \$150.00/hr	30.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/16/2016			
SS	Drafted email to WLC paralegal Samantha Weaver re: schedule for meetings and joint discovery tasks	0.10 \$150.00/hr	NO CHARGE
MVH	email to cocounsel re: suggested inquiry to LPD where documents relevant to individual in LPD's possession, not Acol's possession	0.10 \$475.00/hr	47.50
CLM	emails w/ co counsel re: information in possession of LPD and related subpoena	0.20 \$475.00/hr	95.00
CLM	Reviewed documents, email from Opposing Counsel re: ESI	0.10 \$475.00/hr	47.50
MVH	E-communications w/ co counsel re: discovery in possession of LPD and related subpoena, materials to request	0.20 \$475.00/hr	95.00
MVH	email from Opposing Counsel stating no ESI so no reason to meet	0.10 \$475.00/hr	47.50
MVH	Reviewed discovery requests for additional information that might be in possession of plaintiff, highlighting material he should seek to retrieve if possessed	0.80 \$475.00/hr	380.00
MVH	Reviewed email from Corkery re: subpoena	0.10 \$475.00/hr	NO CHARGE
9/17/2016			
CLM	E-communication w/ co counsel re: discovery responses	0.10 \$475.00/hr	47.50
9/19/2016			
MVH	E-communication to cocounsel re: LPD subpoena	0.10 \$475.00/hr	47.50
CLM	Review of rules re: subpoenas	0.10 \$475.00/hr	47.50
MVH	Reviewed documents, final subpoena and email to Opposing Counsel from Corkery	0.10 \$475.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/19/2016			
CLM	E-communications w/ cocounsel Corkery re: LPD subpoena and other possible subpoenas	0.20 \$475.00/hr	95.00
	MVH Reviewed documents, draft subpoena, edited doc	0.30 \$475.00/hr	142.50
9/20/2016			
SS	Drafting of discovery responses based on existing information	1.00 \$150.00/hr	150.00
9/21/2016			
SS	Preparation for meeting with plaintiff Allan Sergeant and paralegal Samantha Weaver, select and review documents for discussion	0.50 \$150.00/hr	75.00
	SS Meeting w/ WLC paralegal to discuss discovery	0.30 \$150.00/hr	45.00
9/22/2016			
SS	Review and annotation of documents provided by client for discovery responses	0.20 \$150.00/hr	30.00
	MVH Meeting with plaintiff Allan Sergeant, paralegal Sarah Sloan, paralegal Samantha Weaver, attended only beginning of meeting for introduction to process and left rest of meeting to paralegals	0.30 \$475.00/hr	142.50
	SS Meeting with plaintiff Allan Sergeant, paralegal Samantha Weaver and attorney Mara Verheyden-Hilliard who attended portion	2.50 \$150.00/hr	375.00
	SS Follow-up from meeting with plaintiff Allan Sergeant review, annotation and organization of notes for incorporation into discovery responses	0.20 \$150.00/hr	30.00
9/23/2016			
SS	Drafting of discovery responses incorporating information from client meeting	0.50 \$150.00/hr	75.00
9/26/2016			
SS	Drafting of discovery responses, continuing work on interrogatories and Request for Production of Documents with client information	1.00 \$150.00/hr	150.00
9/27/2016			
MVH	Reviewed, drafted and edited initial draft discovery requests/responses and regarding areas of objection	1.30 \$475.00/hr	617.50

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	<u>Hrs/Rate</u>	<u>Amount</u>
9/27/2016		
CLM Reviewed email from Sarah Sloan re: discovery responses and notes	0.10 \$475.00/hr	47.50
MVH E-communication to cocounsel re: drafting discovery responses and objections	0.10 \$475.00/hr	47.50
MVH Meeting w/ Sarah Sloan re: discovery responses, drafting review	0.60 \$475.00/hr	285.00
SS Meeting w/ Mara Verheyden-Hilliard re: discovery responses, information from client, current state of incorporation	0.60 \$150.00/hr	90.00
CLM Sent email to Sarah Sloan re: discovery responses and inclusion of particular identified material	0.10 \$475.00/hr	47.50
CLM Reviewed email from Sarah Sloan re: discovery and current drafting	0.10 \$475.00/hr	47.50
SS Drafting of discovery responses, completion of my drafts based on client meeting and prior notes/documents,	1.00 \$150.00/hr	150.00
9/28/2016		
MVH Meeting w/ Carl Messina and Sarah Sloan re: discovery next steps after discussion w/ cocounsel	0.20 \$475.00/hr	95.00
MVH Reviewed documents, email from Watson re: discovery objections and cases	0.10 \$475.00/hr	47.50
CLM Phone conference w/ co counsel re: discovery, Mara Verheyden-Hilliard, Corkery, Watson	0.40 \$475.00/hr	NO CHARGE
MVH Phone conference w/ cocounsel, Carl Messina, Corkery, Watson re: discovery and objectionable areas	0.40 \$475.00/hr	190.00
CLM Meeting w/ Sarah Sloan and Mara Verheyden-Hilliard re: followup up from phone conference re: discovery and tasks at hand	0.20 \$475.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/28/2016			
SS	Meeting with Mara Verheyden-Hilliard re: status of discovery responses	0.30 \$150.00/hr	45.00
SS	Phone communication with paralegal Samantha Weaver	0.10 \$150.00/hr	15.00
SS	Meeting w/ Carl Messineo and Mara Verheyden-Hilliard re: discovery next steps	0.20 \$150.00/hr	30.00
MVH	Meeting w/ Sarah Sloan re: matters related to discovery, followup questions and delegation of assignments	0.30 \$475.00/hr	142.50
9/29/2016			
MVH	E-communication from cocounsel re: case question on garden variety emotional distress	0.10 \$475.00/hr	47.50
MVH	Research, reviewed case from Watson re: discovery objections, reviewed related references in case	0.30 \$475.00/hr	142.50
MVH	E-communication to cocounsel re: discovery objections and evaluation of case law	0.10 \$475.00/hr	47.50
CLM	Reviewed documents, Mara Verheyden-Hilliard email re: garden variety emotional distress	0.10 \$475.00/hr	NO CHARGE
MVH	Drafted, email to cocounsel re: cases on garden variety emotional distress, included case language	0.20 \$475.00/hr	95.00
MVH	Research, garden variety emotional distress, 4th circuit, DC circuit and other jurisdictions, recent cases collecting cases, including porter v pinkerton; Napolitano	1.30 \$475.00/hr	617.50
10/7/2016			
CLM	Reviewed documents, correspondence from Dan Karp (2 page letter dated 10-6-16 responding to subpoena to produce documents served on City of Laurel)	0.20 \$475.00/hr	95.00
10/11/2016			
SS	Follow-up communication with Mr. Sergeant about damage witnesses	0.10 \$150.00/hr	15.00

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	<u>Hrs/Rate</u>	<u>Amount</u>
10/11/2016		
SS Phone call with Mr. Sergeant to discuss potential witnesses	0.40 \$150.00/hr	60.00
SS Phone call with potential damage witness	0.20 \$150.00/hr	30.00
SS Additional discussions with MVH and CM about responses	0.30 \$150.00/hr	45.00
SS finalized draft interrogatories for attorney review	0.50 \$150.00/hr	75.00
SS Drafting RFPs for attorney review	0.50 \$150.00/hr	75.00
MVH Reviewed email from Corkery re: objections and discovery responses	0.10 \$475.00/hr	47.50
MVH drafted email to co-counsels re: discovery answers, objections, protective order issues; as well as settlement discussions	0.20 \$475.00/hr	95.00
CLM reviewed email from Mara Verheyden-Hilliard to co-counsels re: particular responses in discovery and settlement position at this stage	0.10 \$475.00/hr	NO CHARGE
MVH reviewed email from Corkery re: protective order and medical information, discovery issues, and settlement position	0.10 \$475.00/hr	47.50
CLM Reviewed email from Corkery re: discovery	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Corkery re: discovery	0.10 \$475.00/hr	NO CHARGE
SS Reviewing documents and identified for RFP response	1.50 \$150.00/hr	225.00

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	<u>Hrs/Rate</u>	<u>Amount</u>
10/11/2016		
SS Meeting with MVH and CM to review interrogatories and Requests for Production (RFPs) and discuss paralegal assignment including witness interviews	0.30 \$150.00/hr	45.00
CLM discovery meeting w Sarah Sloan and Mara Verheyden-Hilliard re: plaintiffs responses to Acol's RFPs	0.30 \$475.00/hr	NO CHARGE
MVH Meeting w/ Carl Messineo and Sarah Sloan reviewing interrogatory responses to Acol's requests to Mr. Sergeant, editing discussion of relevancy and privilege	1.10 \$475.00/hr	522.50
MVH Drafted email to co counsel and WLC re: plaintiffs draft discovery responses and questions related to	0.10 \$475.00/hr	47.50
CLM Meeting brief with Sarah Sloan and Mara Verheyden-Hilliard re: followup on interrogatory responses	0.10 \$475.00/hr	NO CHARGE
CLM Meeting w/ Mara Verheyden-Hilliard re: discovery and demand	0.10 \$475.00/hr	NO CHARGE
MVH Meeting w/ Carl Messineo re: lawyers committee emails re: discovery and demand	0.10 \$475.00/hr	47.50
CLM Meeting w/ Mara Verheyden-Hilliard and Sarah Sloan reviewing interrogatory responses to Acol's requests to Mr. Sergeant, editing discussion of relevancy and privilege	1.10 \$475.00/hr	522.50
MVH Drafted response email to lawyers committee re: discovery and demand	0.10 \$475.00/hr	47.50
MVH Drafted, edited interrogatory responses, reviewed related documents for responsive information and privilege, and follow up where additional information necessary	2.80 \$475.00/hr	1,330.00
MVH discovery meeting #2 w/ Carl Messineo and Sarah Sloan re: plaintiffs response to RFPs	0.30 \$475.00/hr	142.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/11/2016			
MVH	Meeting w/ paralegal Sarah Sloan re: interrogatories and Requests for Production (RFPs), providing direction where followup necessary	0.40 \$475.00/hr	190.00
10/12/2016			
MVH	E-communications w/ legal team w/ draft of discovery, questions about objections and discovery meeting w/ client	0.30 \$475.00/hr	142.50
MVH	Meeting w/ Carl Messineo re: interrogatory responses, retaliation and damages	0.20 \$475.00/hr	95.00
MVH	additional emails w/ legal team re: discovery responses, forwarding draft and detailing particular areas	0.20 \$475.00/hr	95.00
CLM	multiple emails between co-counsels re: discovery responses	0.30 \$475.00/hr	NO CHARGE
SS	Scheduling for meeting next day with Mr. Sergeant	0.10 \$150.00/hr	NO CHARGE
SS	Phone calls with potential damage witnesses and preparation of report to Mara Verheyden-Hilliard and Carl Messineo	5.60 \$150.00/hr	840.00
SS	Follow-up communication with Mr. Sergeant about contacting damage witnesses	0.10 \$150.00/hr	15.00
SS	Continuing work on discovery responses to submit for team review	0.30 \$150.00/hr	45.00
MVH	Meeting w/ Sarah Sloan re: potential damage witnesses	0.30 \$475.00/hr	142.50
MVH	Drafted, final edits to draft responses, interrogatories and RFPs	3.80 \$475.00/hr	1,805.00
10/13/2016			
SS	Meeting with Mr. Sergeant to review discovery responses, including preparation and follow up meetings w/ counsel	5.20 \$150.00/hr	780.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/13/2016			
	MVH Reviewed email from Karp and from Corkery re: Houk	0.10 \$475.00/hr	47.50
	MVH Meeting with Mr. Sergeant to review discovery responses, initial meeting w/ client and Sarah Sloan; left rest of meeting to paralegal for client review	0.30 \$475.00/hr	142.50
	CLM Reviewed documents, email from Corkery	0.10 \$475.00/hr	NO CHARGE
	MVH Reviewed documents, amended responses to document requests (sent by Corkery)	0.30 \$475.00/hr	142.50
	CLM Reviewed email from Karp and from Corkery	0.10 \$475.00/hr	NO CHARGE
	CLM Meeting with Mr. Sergeant, Sarah Sloan, D Corkery, L Watson to discuss and review discovery responses	1.00 \$475.00/hr	NO CHARGE
	MVH Meeting w/ client, Sarah Sloan, Carl Messineo, D Corkery and L Watson after client had re:-reviewed responses to discuss in detail	1.00 \$475.00/hr	475.00
	MVH Meeting w/ Sarah Sloan and Carl Messineo to discuss next steps in discovery after conclusion of client and counsel meeting	0.30 \$475.00/hr	142.50
10/14/2016			
	CLM Reviewed edited discovery responses and objections, interrogatories and Requests for Production (RFPs) , coordinated w/ Mara Verheyden-Hilliard re: same in order to address specific areas	3.20 \$475.00/hr	1,520.00
	MVH Drafted, edited final discovery responses, interrogatories and Requests for Production (RFPs) including objections and substantive responses, tasked paralegal at points w/ specific followup, reviewed related documents to confirm information	5.60 \$475.00/hr	2,660.00
10/17/2016			
	CLM Reviewed documents, Acols' answers to interrogatories and responses to requests for production; brief discussion with Mara Verheyden-Hilliard re: same	0.30 \$475.00/hr	142.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/17/2016			
CLM	Reviewed email from Mara Verheyden-Hilliard to DC re: discovery edits	0.10 \$475.00/hr	NO CHARGE
MVH	Reviewed email from DC re: discovery re: final discovery responses	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed email from DC	0.10 \$475.00/hr	47.50
MVH	Reviewed email from DC to Karp transmitting Pls Discovery responses	0.10 \$475.00/hr	NO CHARGE
CLM	reviewed email from DC to Karp transmitting Pls discovery responses	0.10 \$475.00/hr	NO CHARGE
CLM	reviewed email from Mara Verheyden-Hilliard to co-counsels re: summons	0.10 \$475.00/hr	NO CHARGE
MVH	Drafted email to co-counsels re: Houck summons	0.10 \$475.00/hr	47.50
CLM	Reviewed documents, email from Mara Verheyden-Hilliard to co-counsels re: discovery responses	0.10 \$475.00/hr	NO CHARGE
MVH	Drafted email to co-counsel re: Houck discovery	0.10 \$475.00/hr	47.50
CLM	Reviewed email from Sarah Sloan to co-counsels re: discovery documents	0.10 \$475.00/hr	NO CHARGE
MVH	Reviewed documents, Acols' answers to interrogatories and responses to requests for production; brief discussion with CLM re: same	0.30 \$475.00/hr	NO CHARGE
CLM	reviewed email from Mara Verheyden-Hilliard to DC re: interrogatory objections	0.10 \$475.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/17/2016			
MVH	Drafted email to DC regarding interrogatory objections and specific questions at issue and reviewed related docs	0.30 \$475.00/hr	142.50
CLM	Reviewed email from DC re: edits	0.10 \$475.00/hr	NO CHARGE
MVH	Reviewed email from DC enclosing WLC's edits to Sergeant's interrogatory responses	0.30 \$475.00/hr	142.50
CLM	Reviewed email from Mara Verheyden-Hilliard to co-counsels re: discovery	0.10 \$475.00/hr	NO CHARGE
MVH	Drafted email to co-counsels re: interrogatories	0.10 \$475.00/hr	47.50
SS	Finalize and prepare discovery responses for submission including interrogatories, Requests for Production (RFPs), inclusive documents	6.70 \$150.00/hr	1,005.00
SS	Communication with attorneys in person and via email about finalizing discovery responses	0.30 \$150.00/hr	45.00
CLM	Reviewed email from DC to Sarah Sloan re: interrogatories	0.10 \$475.00/hr	NO CHARGE
MVH	Reviewed email from Sarah Sloan to DC re: discovery	0.10 \$475.00/hr	47.50
MVH	Reviewed email from DC re: discovery items	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed email from Sarah Sloan to DC re: discovery	0.10 \$475.00/hr	NO CHARGE
SS	Drafted email to DC re: discovery and information	0.10 \$150.00/hr	15.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/17/2016			
MVH	Reviewed email from DC to Sarah Sloan re: interrogatories	0.10 \$475.00/hr	NO CHARGE
MVH	Reviewed email from DC re: discovery	0.10 \$475.00/hr	NO CHARGE
MVH	Reviewed email from DC	0.10 \$475.00/hr	47.50
CLM	Reviewed email from DC re: discovery responses	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed email from DC re: Houck summons	0.10 \$475.00/hr	NO CHARGE
MVH	sent email to DC re: final responses and objections	0.10 \$475.00/hr	47.50
CLM	Reviewed email from Mara Verheyden-Hilliard to DC re: final responses	0.10 \$475.00/hr	NO CHARGE
MVH	Reviewed email from Sarah Sloan to co-counsels re: discovery responses	0.10 \$475.00/hr	47.50
CLM	Reviewed email from DC re: transmittal of discovery	0.10 \$475.00/hr	NO CHARGE
MVH	drafted email to DC re: final discovey responses	0.10 \$475.00/hr	47.50
CLM	reviewed email from Mara Verheyden-Hilliard to DC re: discovery	0.10 \$475.00/hr	NO CHARGE
MVH	reviewed email from DC re: discovery transmittal	0.10 \$475.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/17/2016			
CLM	reviewed email from DC re: discovery transmittal	0.10 \$475.00/hr	NO CHARGE
MVH	Reviewed email from Sarah Sloan, transmitting to co-counsels Pls Objections and Responses to Interrogatories, Objections and Responses to Requests for Production (RFPs), and PL-0001 through 43	0.30 \$475.00/hr	NO CHARGE
CLM	Reviewed transmittal email from Sarah Sloan to co-counsels transmitting Pls Objections and Responses to Interrogatories, Objections and Responses to Requests for Production (RFPs), and PL-0001 through 43	0.10 \$475.00/hr	NO CHARGE
MVH	reviewed email from Sarah Sloan to DC re: discovery	0.10 \$475.00/hr	NO CHARGE
CLM	reviewed email from Sarah Sloan to DC re: documents	0.10 \$475.00/hr	NO CHARGE
10/19/2016			
CLM	Meeting w/ Sarah Sloan re: medical information for client discovery	0.20 \$475.00/hr	95.00
SS	meeting w/ Carl Messineo re: medical information for client discovery	0.20 \$150.00/hr	30.00
10/20/2016			
SS	Receive discovery responses, prepare and distribute	0.20 \$150.00/hr	30.00
10/21/2016			
MVH	Reviewed sections of def discovery responses (coord w/ Carl Messineo for different areas), annotating and indexing for follow up	3.60 \$475.00/hr	1,710.00
MVH	Reviewed documents, initial brief review of discovery responses, contradicting denials in Answer	1.80 \$475.00/hr	855.00
MVH	Reviewed documents, audio interview of Acol provided, sent email to co counsel with key transcribed quotations	1.70 \$475.00/hr	807.50
CLM	E-communications w/ co counsels re: provision of medical records	0.20 \$475.00/hr	95.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/21/2016			
MVH	Phone call w/cocounsel WLC and Carl Messineo re: retaining expert and next steps	0.70 \$475.00/hr	332.50
MVH	email to cocounsel WCL re: sexual assault trauma symptoms and potential expert	0.10 \$475.00/hr	47.50
CLM	E-communication to cocounsel re: timing of expert report and review of rules	0.40 \$475.00/hr	190.00
CLM	Phone call w/ cocounsel WLC and Mara Verheyden-Hilliard re: expert and next steps in matter	0.70 \$475.00/hr	NO CHARGE
MVH	Phone call w/ expert Gorin, Carl Messineo and Corkery	0.50 \$475.00/hr	NO CHARGE
CLM	Phone call w/ expert Gorin, Mara Verheyden-Hilliard and Corkery	0.50 \$475.00/hr	237.50
CLM	Review defendant discovery responses begin annotating, indexing with follow up areas for areas	5.30 \$475.00/hr	2,517.50
10/24/2016			
CLM	Reviewed scheduling order; drafted email to Opposing Counsel re: amendments to accommodate expert witness designation	0.30 \$475.00/hr	142.50
CLM	reviewed email from Dennis C. re: expert witness	0.10 \$475.00/hr	47.50
CLM	reviewed response from Opposing Counsel re: scheduling and expert witness	0.10 \$475.00/hr	47.50
MVH	Drafted email re: expert witness designation and p/c w/ Carl Messineo re: same	0.20 \$475.00/hr	NO CHARGE
10/28/2016			
SS	Work on obtaining medical records pursuant to agreement to produce	0.10 \$150.00/hr	15.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
10/28/2016			
MVH	Meeting w/ Carl Messineo re: next steps in sergeant case, outlining ongoing discovery and other matters	2.00 \$475.00/hr	NO CHARGE
	CLM Meeting w/ Mara Verheyden-Hilliard re: next steps in sergeant case, outlining ongoing discovery and other matters	2.00 \$475.00/hr	950.00
10/31/2016			
SS	Work on obtaining medical records pursuant to agreement to produce	0.30 \$150.00/hr	45.00
	CLM Reviewed documents, email from Corkery re: expert	0.10 \$475.00/hr	NO CHARGE
	CLM Reviewed documents, email from Gorin	0.10 \$475.00/hr	47.50
	CLM Reviewed documents, email from Corkery re: expert	0.10 \$475.00/hr	NO CHARGE
	CLM Reviewed documents email from expert	0.10 \$475.00/hr	47.50
11/1/2016			
CLM	Phone call w/ Corkery re: subpoena	0.20 \$475.00/hr	95.00
	SS Work on obtaining medical records pursuant to agreement to produce	0.10 \$150.00/hr	15.00
	CLM Reviewed documents, continued to annotate and index discovery production from City of Laurel and Acol, including recordings of three interviews and accompanying objections	4.30 \$475.00/hr	2,042.50
	MVH Review of discovery, added to annotations and indexing of available materials, further outlining next steps in discovery and followup	3.60 \$475.00/hr	1,710.00
11/2/2016			
SS	Assist attorney in reviewing audio and documents for deficiency letter	0.50 \$150.00/hr	75.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/2/2016	CLM Drafted detailed deficiency letter re: discovery production, reviewed related case law and basis for production	4.50 \$475.00/hr	2,137.50
11/3/2016	MVH Drafted, reviewed Carl Messineo and Corkery's draft deficiency letter, edited with additional areas, reviewed related documents, LPD and Acol discovery responses	1.50 \$475.00/hr	712.50
	SS Prep and transmission of deficiency letter	0.30 \$150.00/hr	45.00
	CLM Drafted, edited detailed deficiency letter to Opposing Counsel re: withheld materials, interrogatory responses, point by point analysis	2.50 \$475.00/hr	1,187.50
11/4/2016	SS Review of emails from Mr. Karp	0.10 \$150.00/hr	NO CHARGE
11/15/2016	CLM E-communications w/ Corkery and Opposing Counsel re: protective order and FTO file	0.10 \$475.00/hr	NO CHARGE
11/21/2016	CLM Receipt, initial review FTO files, annotated, excerpted portions sent to cocounsel	1.90 \$475.00/hr	902.50
11/22/2016	SS Discussion w/ attorneys of potential damage witnesses for expert to speak with	0.20 \$150.00/hr	30.00
	MVH E-communications w/ cocounsel re: damage witnesses, reviewing Sarah Sloan details	0.20 \$475.00/hr	95.00
	SS Prep of notes for attorneys related to potential damage witnesses for expert to speak with	0.10 \$150.00/hr	15.00
	MVH meeting w/ Sarah Sloan re: damage witnesses and expert	0.20 \$475.00/hr	95.00
	MVH w/ cocounsel WLC re: confidentiality ordres	0.10 \$475.00/hr	47.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/22/2016			
CLM	E-communications w/cocounsels re: protective order	0.10 \$475.00/hr	47.50
11/28/2016			
MVH	Reviewed documents, Sergeant's medical records	0.30 \$475.00/hr	142.50
CLM	Meeting with Mara Verheyden-Hilliard re: scope of proposed confidentiality stipulation sent by Opposing Counsel; reviewed alternative formulations used in other cases	0.80 \$475.00/hr	NO CHARGE
SS	Calls to potential damage witnesses about speaking with expert	0.40 \$150.00/hr	60.00
MVH	Meeting with Carl Messineo to discuss Sergeant's medical records	0.20 \$475.00/hr	NO CHARGE
MVH	Meeting with Carl Messineo re: scope of proposed confidentiality stipulation sent by Opposing Counsel; reviewed alternative formulations used in other cases, reviewed Court rules and stipulated orders	0.80 \$475.00/hr	380.00
CLM	Drafted letter motion to compel re: ROI, including case law research	2.10 \$475.00/hr	997.50
MVH	Research on confidentiality orders and scope in circuit	0.30 \$475.00/hr	142.50
MVH	emails to co counsel re: scope of confidentiality order and retroactivity	0.10 \$475.00/hr	47.50
CLM	Meeting with Mara Verheyden-Hilliard to discuss Sergeant's medical records	0.20 \$475.00/hr	95.00
11/29/2016			
CLM	Meeting with Carl Messineo re: confidentiality proposal	0.20 \$475.00/hr	95.00
MVH	Meeting with Carl Messineo re: confidentiality proposal	0.20 \$475.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/29/2016			
CLM	Drafted revisions to proposed confidentiality order, transmitted to Opposing Counsel w accompanying email letter	0.60 \$475.00/hr	285.00
CLM	Research, reviewed local rules regarding confidentiality stipulations	0.20 \$475.00/hr	95.00
CLM	Drafted letter motion to compel re: ROI, including additional case law research	2.00 \$475.00/hr	950.00
11/30/2016			
SS	Communication with expert about speaking with potential damage witnesses	0.20 \$150.00/hr	30.00
12/1/2016			
SS	Discussion with Mr. Sergeant about completion of documents for expert	0.30 \$150.00/hr	45.00
SS	Meeting with Carl Messineo re: docs for expert	0.20 \$150.00/hr	30.00
SS	Meeting with Carl Messineo and Mara Verheyden-Hilliard re: docs for expert	0.30 \$150.00/hr	45.00
SS	Prep of medical records for production	0.20 \$150.00/hr	30.00
CLM	Phone call with Dennis C. regarding communications with expert	0.20 \$475.00/hr	95.00
SS	Calls to potential damage witnesses about speaking with expert	0.10 \$150.00/hr	15.00
CLM	Meeting with Sarah Sloan re: Sergeant re: information for expert	0.20 \$475.00/hr	95.00
MVH	Meeting w/ Carl Messineo and Sarah Sloan re: docs for expert	0.30 \$475.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/2/2016			
SS	Delivery of documents to expert	0.50 \$150.00/hr	75.00
SS	Finalization and transmission of medical records to opposing counsel	0.30 \$150.00/hr	45.00
SS	Filing letter brief on discovery dispute	0.30 \$150.00/hr	45.00
MVH	additional medical records of client	0.20 \$475.00/hr	95.00
12/3/2016			
SS	Prep for upcoming amended discovery responses and expert designation	0.30 \$150.00/hr	45.00
12/4/2016			
CLM	Reviewed documents, expert witness report	1.00 \$475.00/hr	475.00
12/5/2016			
SS	Prep and transmission of amended discovery responses	0.50 \$150.00/hr	75.00
12/6/2016			
CLM	Drafted supplemental discovery production re: expert, designation of expert	0.80 \$475.00/hr	380.00
SS	Preparation and assembly of for upcoming amended discovery responses and expert designation	0.30 \$150.00/hr	45.00
12/7/2016			
CLM	Reviewed documents, revised confidentiality stipulation returned by Opposing Counsel	0.30 \$475.00/hr	142.50
CLM	Drafted email to co-counsel	0.10 \$475.00/hr	47.50
CLM	review and annotate materials produced in discovery, including FTO file	4.50 \$475.00/hr	2,137.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/8/2016			
SS	Prep and transmission of amended discovery responses and expert designation	1.00 \$150.00/hr	150.00
12/14/2016			
CLM	Phone call with co counsel Mara Verheyden-Hilliard , Sarah Sloan, Dennis Corkery, Leah Watson re: discovery, indemnification, defendants assets, expert matters, additional information from client	1.00 \$475.00/hr	NO CHARGE
CLM	multiple emails discussion on next steps based on Acol's defenses and discovery thus far	0.40 \$475.00/hr	190.00
MVH	Phone call with co counsel, Carl Messineo, Sarah Sloan, Dennis Corkery, Leah Watson re: discovery, indemnification, defendants assets, expert matters, additional information from client	1.00 \$475.00/hr	475.00
SS	Review of notes from Acol depo and prep for further discovery	0.50 \$150.00/hr	75.00
12/15/2016			
CLM	Reviewed documents, ROI	0.20 \$475.00/hr	95.00
MVH	Meeting with Carl Messineo re: ROI	0.30 \$475.00/hr	NO CHARGE
CLM	Meeting with Mara Verheyden-Hilliard re: ROI	0.30 \$475.00/hr	142.50
MVH	drafted email to cocounsel re: defendant dropped objection to withholding ROI, but not yet produced	0.10 \$475.00/hr	47.50
MVH	Reviewed documents, ROI	0.20 \$475.00/hr	95.00
12/20/2016			
SS	Review and filing additional discovery responses received by mail	0.20 \$150.00/hr	30.00
12/21/2016			
CLM	Reviewed documents, add'l document production from Acol	1.00 \$475.00/hr	475.00

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	<u>Hrs/Rate</u>	<u>Amount</u>
12/21/2016		
MVH Reviewed documents, add'l document production from Acol	1.00 \$475.00/hr	475.00
MVH Reviewed documents, deficiency letter drafted by Leah Watson	0.30 \$475.00/hr	142.50
1/3/2017		
MVH Drafted email to co counsel re: outstanding discovery	0.10 \$475.00/hr	47.50
CLM Reviewed email from Leah Watson	0.10 \$475.00/hr	NO CHARGE
CLM Emails w/ corkery re: discovery repsonses	0.10 \$475.00/hr	47.50
CLM Reviewed documents, email from Corkery	0.10 \$475.00/hr	47.50
1/4/2017		
CLM Reviewed email from Corkery to Karp re: discoverability of income tax returns	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Opposing Counsel to Corkery	0.10 \$475.00/hr	NO CHARGE
1/5/2017		
CLM Reviewed email from Opposing Counsel supplementing discovery by identifying newly disclosed law enforcement witness, Detective Natalie Gaston	0.10 \$475.00/hr	47.50
CLM Meeting with Mara Verheyden-Hilliard re: late disclosure of new law enforcement witness	0.20 \$475.00/hr	95.00
MVH Meeting with CLM re: late disclosure of new law enforcement witness	0.20 \$475.00/hr	95.00
CLM Drafted areas of inquiry for additional subpoena duces tecum and Rule 30(b)(6) deposition relating to Acol's punitive damage defenses (FTO training incidents, adverse action and punishments to Acol, policies and practices and trainings)	1.40 \$475.00/hr	665.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/6/2017	MVH Drafted email to Samantha Weaver re: acronym used by LPD	0.10 \$475.00/hr	47.50
1/9/2017	CLM Reviewed email from Corkery re: discovery and extension	0.10 \$475.00/hr	47.50
1/10/2017	CLM email from Corkery	0.10 \$475.00/hr	NO CHARGE
	MVH Reviewed multiple emails between cocounsel regarding discovery	0.20 \$475.00/hr	NO CHARGE
	SS Review and filing of correspondance from Leah Watson to Karp	0.10 \$150.00/hr	NO CHARGE
	SS Review and filing of correspondance from Karp	0.10 \$150.00/hr	NO CHARGE
	CLM Reviewed email from Opposing Counsel seeking disclosure of psychological data and interview notes for purposes of review by psychologist, after the elapse of the deadline for expert witness disclosures	0.10 \$475.00/hr	47.50
1/11/2017	CLM Sent email to Leah Watson re: service of subpoenas	0.10 \$475.00/hr	NO CHARGE
	CLM Drafted email to Leah Watson re: subpoena discovery	0.10 \$475.00/hr	47.50
	MVH Reviewed multiple emails between cocounsel re: discovery and mediation	0.20 \$475.00/hr	NO CHARGE
1/12/2017	CLM Meeting with Mara Verheyden-Hilliard re: whether to assert objections to Acol's Notice of Records Deposition for the CJIS Repository	0.20 \$475.00/hr	95.00
	CLM Reviewed Acol's Notice of Records Deposition for the CJIS Central Repository	0.10 \$475.00/hr	47.50

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	<u>Hrs/Rate</u>	<u>Amount</u>
1/12/2017		
MVH Meeting with Carl Messineo re: whether to assert objections to Acol's Notice of Records Deposition for the CJIS Repository	0.20 \$475.00/hr	95.00
CLM Reviewed email from Corkery, including edit to letter to Opposing Counsel	0.10 \$475.00/hr	NO CHARGE
CLM Phone call with Corkery re: disclosure of psychological data	0.10 \$475.00/hr	47.50
CLM Research re: disclosure of additional psychological testing data where defendant has declined to identify an expert witness	0.40 \$475.00/hr	190.00
MVH E-communication to cocounsel re: discovery and subpoenas	0.10 \$475.00/hr	NO CHARGE
CLM Phone call with Corkery re: discovery matters and expert witness	0.20 \$475.00/hr	95.00
CLM Drafted letter to Opposing Counsel re: multiple discovery issues, communicated w/ cocounsel regarding same	0.70 \$475.00/hr	332.50
CLM Reviewed documents, recent correspondence with Opposing Counsel pertaining to request for psychological records, testifying expert, PI's request for leave to amend, add'l depositions	0.30 \$475.00/hr	142.50
CLM Phone call with Mara Verheyden-Hilliard re: letter to Opposing Counsel re: discovery	0.20 \$475.00/hr	95.00
1/17/2017		
CLM Reviewed email forwarded by Leah Watson	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Leah Watson	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from expert witness	0.10 \$475.00/hr	NO CHARGE

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	<u>Hrs/Rate</u>	<u>Amount</u>
1/17/2017		
CLM Reviewed email from Leah Watson	0.10 \$475.00/hr	NO CHARGE
CLM sent e-mail to Leah Watson re: expert discovery	0.10 \$475.00/hr	47.50
CLM Reviewed email from Leah Watson	0.10 \$475.00/hr	NO CHARGE
MVH Reviewed multiple E-communications among cocounsel re: discovery	0.20 \$475.00/hr	NO CHARGE
1/25/2017		
SS Assist attorney with preparation of interrogatories on net worth	0.20 \$150.00/hr	30.00
CLM Drafted interrogatories on net worth, including related research for exemplars	1.10 \$475.00/hr	522.50
MVH E-communications w/ cocounsel re: discovery matters and court phone hearing	0.30 \$475.00/hr	NO CHARGE
CLM Reviewed email from Opposing Counsel re: discovery from Houck	0.10 \$475.00/hr	NO CHARGE
CLM Research, case law on evidence of net worth for punitive damages, including measures of wealth of defendant in Fourth Circuit and District Courts	0.50 \$475.00/hr	237.50
SS Prep of potentially responsive written discovery information in anticipation of the Letter Order	0.30 \$150.00/hr	45.00
SS Meet with CM about potentially responsive information in anticipation of the Letter Order	0.20 \$150.00/hr	30.00
CLM Meeting with Sarah Sloan and Mara Verheyden-Hilliard re: items on post-court hearing Action Item list	0.30 \$475.00/hr	142.50

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	<u>Hrs/Rate</u>	<u>Amount</u>
1/25/2017		
MVH Meeting with Sarah Sloan and Carl Messineo re: items on post-court hearing Action Item list	0.30 \$475.00/hr	NO CHARGE
SS Meeting with Carl Messineo and Mara Verheyden-Hilliard re: items on post-court hearing Action Item list	0.30 \$150.00/hr	45.00
CLM Reviewed email from Leah Watson to Opposing Counsel re: outstanding discovery deficiencies	0.10 \$475.00/hr	NO CHARGE
1/26/2017		
CLM Reviewed email from Watson to Opposing Counsel	0.10 \$475.00/hr	NO CHARGE
SS Prep of responsive written discovery information to Letter Order	0.30 \$150.00/hr	45.00
SS Meet with CM about responsive information to the Letter Order	0.20 \$150.00/hr	30.00
CLM Reviewed email from Opposing Counsel to Leah Watson	0.10 \$475.00/hr	NO CHARGE
SS Review communications from attorneys about next step tasks to respond to Letter Order	0.10 \$150.00/hr	15.00
SS Sent e-mail to attorneys re: letter order next steps	0.10 \$150.00/hr	15.00
MVH Meeting with Carl Messineo re: tax returns and impeachment issues asserted by Opposing Counsel	0.30 \$475.00/hr	NO CHARGE
SS Review Letter Order (ECF No. 54)	0.20 \$150.00/hr	30.00
1/27/2017		
CLM drafted letter to Corkery re: tax returns	0.10 \$475.00/hr	47.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/27/2017			
CLM	Reviewed email response from Corkery re: tax returns	0.10 \$475.00/hr	NO CHARGE
SS	Review communications between attorneys about next steps to respond to Letter Order	0.10 \$150.00/hr	NO CHARGE
SS	phone call w/ client including arranging meeting with client for Jan. 31	0.10 \$150.00/hr	15.00
1/30/2017			
SS	Communication with paralegal Samantha Weaver about documents needed from client for meeting the next day	0.20 \$150.00/hr	30.00
SS	Research tax transcripts	0.10 \$150.00/hr	15.00
1/31/2017			
SS	Draft amended responses to interrogatories and RFPs based on Letter Order	0.50 \$150.00/hr	75.00
SS	Meeting with Mr. Sergeant, attorneys (Mara Verheyden-Hilliard, Carl Messineo, Dennis Corkery, Leah Watson) and paralegals (Sarah Sloan, Samantha Weaver); attorneys left after first part/ second part discovery responses with Samantha Weaver and client	2.00 \$150.00/hr	300.00
SS	Working with client to identify responsive information and documents to outstanding discovery requests (after in person meeting)	1.90 \$150.00/hr	285.00
MVH	Meeting w/ Sarah Sloan and Carl Messineo after Sarah Sloan had further meeting with client (w/o attys) and calls w/ client re: supplementing discovery and information retrieved	0.50 \$475.00/hr	237.50
CLM	Meeting with Sarah Sloan re: Drafting of Plaintiff's Amended Responses to Acol's Interrogatory No. 2 and Request for Production of Documents No. 1 in light of Court's letter order	0.20 \$475.00/hr	95.00
SS	Meeting with Carl Messineo re: Drafting of Plaintiff's Amended Responses to Acol's Interrogatory No. 2 and Request for Production of Documents No. 1 in light of Court's letter order	0.20 \$150.00/hr	30.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/31/2017			
SS	Review and filing of Karp's response to deficiency letter and additional production	0.10 \$150.00/hr	NO CHARGE
SS	Drafted outline of Plaintiff's Amended Responses to Acol's Interrogatory No. 2 and Request for Production of Documents No. 1	0.50 \$150.00/hr	75.00
MVH	Review discovery documents provided by Opposing Counsel, including consent to search form; related email to cocounsel	0.30 \$475.00/hr	142.50
CLM	Reviewed incoming supplemental production of discovery from Officer Acol	0.40 \$475.00/hr	190.00
2/1/2017			
MVH	Phone call w/ Carl Messineo and WLC Corkery re: outstanding matters for client	0.30 \$475.00/hr	142.50
MVH	Meeting w/ Carl Messineo re: outstanding discovery matters re: client	0.40 \$475.00/hr	190.00
2/2/2017			
CLM	Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
CLM	Edited Plaintiff's Amended Responses to Acol's Interrogatory No. 2 and Request for Production of Documents No. 1 in light of Court's letter order and sent related email to co-counsel	0.20 \$475.00/hr	95.00
CLM	emails w/ Corkery re: client's additional responses to discovery	0.10 \$475.00/hr	47.50
CLM	Reviewed interrogatories on net worth and transmitted to Corkery and cocounsel for comment	0.40 \$475.00/hr	190.00
SS	Assist attorney with draft interrogatories on net worth	0.20 \$150.00/hr	30.00
SS	Continued drafting of amended responses to interrogatories and RFPs based on Letter Order	0.30 \$150.00/hr	45.00

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	<u>Hrs/Rate</u>	<u>Amount</u>
2/3/2017		
SS Communication with client by phone re: outstanding matters	0.30 \$150.00/hr	45.00
2/6/2017		
CLM Reviewed email from Opposing Counsel	0.10 \$475.00/hr	NO CHARGE
MVH Phone call w/ client re: outstanding matters and status	0.30 \$475.00/hr	142.50
MVH Phone call w/ Sarah Sloan re: information client requires	0.10 \$475.00/hr	47.50
SS Communication with client by phone re: outstanding matters	0.20 \$150.00/hr	30.00
2/7/2017		
MVH E-communications w/ cocounsel corkery re: consulting on discovery response	0.10 \$475.00/hr	47.50
MVH E-communications, multiple w/ cocounsel re: discovery responses	0.20 \$475.00/hr	NO CHARGE
CLM reviewed email from Corkery to Opposing Counsel	0.10 \$475.00/hr	NO CHARGE
CLM reviewed email from Corkery to Dr. Gorin	0.10 \$475.00/hr	NO CHARGE
SS Preparation and transmission of Second Set of Interrogatories to Acol	0.50 \$150.00/hr	75.00
CLM Sent email to Corkery in response re: expert disclosures	0.10 \$475.00/hr	47.50
CLM reviewed email from Corkery re: expert	0.10 \$475.00/hr	NO CHARGE

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	<u>Hrs/Rate</u>	<u>Amount</u>
2/7/2017		
CLM Reviewed email from Dr. Gorin to Corkery	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Gorin re: disclosures	0.10 \$475.00/hr	47.50
CLM sent email to Dr. Gorin re: categories of disclosures	0.10 \$475.00/hr	47.50
CLM reviewed email from Corkery to Dr. Gorin	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Corkery to Dr. Gorin	0.10 \$475.00/hr	NO CHARGE
CLM reviewed email from Corkery to Opposing Counsel	0.10 \$475.00/hr	NO CHARGE
CLM reviewed email from Corkery to Dr. Gorin	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Dr. Gorin to Corkery	0.10 \$475.00/hr	NO CHARGE
SS Continued drafting of amended responses to interrogatories and RFPs based on Letter Order	1.00 \$150.00/hr	150.00
CLM Reviewed email from Corkery in response to Mara Verheyden-Hilliard re: expert	0.10 \$475.00/hr	NO CHARGE
SS transmitted PI Allan Sergeant's Second Set of Interrogatories to Defendant Alfie G. Acol	0.10 \$150.00/hr	NO CHARGE
CLM Reviewed email from Mara Verheyden-Hilliard to Corkery and Watson re: expert discovery	0.10 \$475.00/hr	NO CHARGE

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	<u>Hrs/Rate</u>	<u>Amount</u>
2/7/2017		
CLM Reviewed email from Opposing Counsel re: expert discovery	0.10 \$475.00/hr	NO CHARGE
CLM reviewed email from Corkery re: requests for Admissions, including attachment with draft RFAs	0.20 \$475.00/hr	95.00
CLM Reviewed response from Corkery	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed documents, discovery propounded to Plaintiff to confirm what is outstanding; drafted related email to Corkery	0.30 \$475.00/hr	142.50
CLM Reviewed email from Corkery re: discovery	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Mara Verheyden-Hilliard to Corkery re: discovery	0.10 \$475.00/hr	NO CHARGE
SS Drafted outline responses to Houck Interrogatory No. 1 and Request for Production of Documents No. 1	0.40 \$150.00/hr	60.00
SS Calendaring of call with attorneys and consultant	0.10 \$150.00/hr	NO CHARGE
2/8/2017		
SS Communication with client by phone re: outstanding discovery questions	0.10 \$150.00/hr	15.00
CLM Reviewed email re: language for client's additional discovery responses	0.10 \$475.00/hr	47.50
SS Review of expert's redacted notes and preparation of notes to attorneys	0.30 \$150.00/hr	45.00
CLM Phone call w/ Mara Verheyden-Hilliard , DCorkery, consulting atty to discuss client discovery response	0.30 \$475.00/hr	142.50

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	<u>Hrs/Rate</u>	<u>Amount</u>
2/8/2017		
MVH Reviewed documents, Dr. Gorin's notes	0.30 \$475.00/hr	142.50
MVH Phone call w/ Carl Messineo, DCorkery, consulting attorney to discuss client discovery response	0.30 \$475.00/hr	NO CHARGE
CLM reviewed email from Corkery to Dr. Gorin	0.10 \$475.00/hr	NO CHARGE
MVH Phone call w/ cocounsel Corkery re: client outstanding matters	0.10 \$475.00/hr	47.50
MVH E-communications (additional) w/ cocounsel re: letter to client	0.10 \$475.00/hr	47.50
CLM Reviewed email from Corkery to Opposing Counsel	0.10 \$475.00/hr	NO CHARGE
2/9/2017		
SS Communication with client by phone	0.10 \$150.00/hr	15.00
SS Additional communication re: client responses to discovery	0.10 \$150.00/hr	15.00
2/13/2017		
CLM Reviewed email from Sarah Sloan re: discovery	0.10 \$475.00/hr	NO CHARGE
CLM Edited PI's Discovery responses and amended discovery responses as relates to tax filings	0.20 \$475.00/hr	95.00
CLM Meeting with Mara Verheyden-Hilliard re: PI's Discovery responses and amended discovery responses as relates to tax filings	0.20 \$475.00/hr	95.00
MVH Meeting with Carl Messineo re: PI's Discovery responses and amended discovery responses as relates to tax filings	0.20 \$475.00/hr	NO CHARGE

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	<u>Hrs/Rate</u>	<u>Amount</u>
2/13/2017		
MVH Drafted additional revisions to Plaintiff's discovery responses	0.20 \$475.00/hr	95.00
CLM Sent email to Corkery w/ draft responses to Houck's discovery and amended responses to Acol	0.10 \$475.00/hr	47.50
CLM Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
CLM Sent email to Sarah Sloan re: discovery communications w/ client	0.10 \$475.00/hr	47.50
CLM Reviewed transmission from Corkery of RFAs	0.20 \$475.00/hr	NO CHARGE
SS Review and file Requests for Admission transmitted by Dennis Corkery to Karp	0.10 \$150.00/hr	NO CHARGE
CLM Drafted additional requests for admission to Acol and Houck, including add'l review of cases related to strip search and legal standards	2.50 \$475.00/hr	1,187.50
CLM Sent email to co-counsels and reviewed response	0.10 \$475.00/hr	NO CHARGE
CLM sent email to Corkery re: language for discovery responses on taxes	0.10 \$475.00/hr	47.50
2/14/2017		
SS Preparation, final, and transmittal of hard copy discovery responses to Opposing Counsel	1.00 \$150.00/hr	150.00
SS Meet with client to review substance of final amended discovery responses	0.50 \$150.00/hr	75.00
SS preparation of and electronic transmittal of discovery responses to Opposing Counsel	0.10 \$150.00/hr	15.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/21/2017			
SS	Review, filing and transmission to attorneys of discovery related materials	0.10 \$150.00/hr	NO CHARGE
	No Charge	21.90	\$9,752.50
	Billable Fees	179.70	\$68,295.00

Litigation phase: Depositions (including Preparation)

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
	<u>Depositions (including Preparation)</u>		
11/7/2016			
SS	Preperatory work regarding upcoming depositions of Sergeant and Acol	0.10 \$150.00/hr	15.00
11/22/2016			
SS	Scheduling depo prep for Mr. Sergeant	0.10 \$150.00/hr	15.00
	SS discussion of depo prep for Mr. Sergeant w/ legal team	0.10 \$150.00/hr	15.00
12/1/2016			
CLM	Phone call with Dennis C. regarding deposition Preparation of Sergeant, the role of Ms. Watson, clients trauma in reliving incident	0.30 \$475.00/hr	142.50
MVH	Meeting w/ Sarah Sloan and Carl Messineo re: meeting w/ sergeant and deposition	0.30 \$475.00/hr	NO CHARGE
CLM	Meeting with Sarah Sloan and Mara Verheyden-Hilliard re: tomorrow's meeting with Mr. Sergeant re: deposition	0.30 \$475.00/hr	142.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/2/2016			
SS	Depo prep 1 of 3 with client and attorneys/paralegals	3.50 \$150.00/hr	525.00
MVH	Deposition prep for Mr. Sergeant, present for beginning of meeting to assist client on process and address concerns re: reliving traumatic event	0.70 \$475.00/hr	332.50
CLM	Deposition prep for Mr. Sergeant, present at beginning of meeting to provide info to client about process	0.70 \$475.00/hr	332.50
12/5/2016			
SS	Assist attorney in prep for Acol deposition	0.50 \$150.00/hr	75.00
CLM	Phone call w/ corkery re: deposition Preparation and assembly of of client	0.20 \$475.00/hr	NO CHARGE
12/6/2016			
MVH	Meeting with Carl Messineo re: depo Preparation and assembly of for Acol	0.30 \$475.00/hr	NO CHARGE
CLM	Meeting with client and Leah W, and Mara Verheyden-Hilliard, for deposition preparation	3.00 \$475.00/hr	1,425.00
SS	Assist attorney in prep for Acol deposition	0.50 \$150.00/hr	75.00
MVH	Meeting w/ client and Carl Messineo and leah watson for depo prep	3.00 \$475.00/hr	NO CHARGE
CLM	Meeting with Mara Verheyden-Hilliard re: depo Preparation and assembly of for Acol deposition	0.30 \$475.00/hr	142.50
12/7/2016			
SS	Continuing assistance of attorney in prepping for Acol depo	1.00 \$150.00/hr	150.00
CLM	Review and annotate the audio taped statement of Acol to investigator Barry (3.5 hours), creating clips for possible use in deposition; Legal Research, strip	6.50 \$475.00/hr	3,087.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
	search cases, scope of consent cases, reasonable suspicion for the seizures and searches in the fact narrative (3.0)		
12/8/2016			
CLM	Depo Preparation for Acol deposition, elements under case law, questions drafting, documents to be pulled by paralegal	2.40 \$475.00/hr	1,140.00
	SS Continuing assistance of attorney in prepping for Acol depo	2.00 \$150.00/hr	300.00
12/9/2016			
SS	Continuing assistance of attorney in prepping for Acol depo	1.00 \$150.00/hr	150.00
	CLM Depo prep for Mr. Sergeant	3.00 \$475.00/hr	1,425.00
	SS Depo prep for Mr. Sergeant	3.00 \$150.00/hr	450.00
12/12/2016			
MVH	Meeting with Sarah Sloan and others re: Sergeant deposition	0.40 \$475.00/hr	NO CHARGE
	CLM Meeting with Sarah Sloan and others re: Sergeant deposition, which Acol and Houck attended	0.40 \$475.00/hr	190.00
	SS Final prep of materials for Acol depo	2.00 \$150.00/hr	300.00
	SS Mr. Sergeant's deposition, attended, took notes for Carl Messineo and upcoming deposition of Acol, including 1/2 travel each way and meeting w/ client afterwards	5.00 \$150.00/hr	750.00
	CLM Preparation for deposition of Acol; prepared questions based on categorization of Acol's full denials in Answer of key facts, corresponding written and audio material in discovery, requirements of proof, related case law	6.90 \$475.00/hr	3,277.50
12/13/2016			
CLM	Phone call w/ Mara Verheyden-Hilliard and Corkery re: acol Deposition, after depo	0.40 \$475.00/hr	190.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/13/2016			
MVH	Phone call w/ Carl Messineo and Corkery re: Acol deposition	0.40 \$475.00/hr	NO CHARGE
CLM	Deposition of Acol, 4.5 depo time plus 1.0 hours travel	5.50 \$475.00/hr	2,612.50
SS	Acol's depo	5.50 \$150.00/hr	825.00
MVH	Meeting with Sarah Sloan re: Acol deposition	0.40 \$475.00/hr	190.00
1/3/2017			
SS	Receipt and filing of transcripts from Sergeant and Acol depos	0.30 \$150.00/hr	45.00
MVH	Reviewed documents, Acol's deposition, noted key areas	0.70 \$475.00/hr	332.50
MVH	Reviewed documents, clients deposition, annotated	0.80 \$475.00/hr	380.00
CLM	Received e-mail from Samantha Weaver	0.10 \$475.00/hr	NO CHARGE
CLM	E-mail from Samantha Weaver	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed email from Samantha Weaver to MVH	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed email from MVH	0.10 \$475.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/3/2017			
CLM	Reviewed email from MVH	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed email from Sarah Sloan	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed, annotated and issue coded the transcript of Acol deposition	4.30 \$475.00/hr	2,042.50
1/4/2017			
CLM	Drafted email to co-counsel re: deposition dates and proposed selection of deponents (confer with Mara Verheyden-Hilliard re: strategy, who to depose and when)	0.40 \$475.00/hr	190.00
SS	Receipt and filing of additional formats of depo transcripts	0.10 \$150.00/hr	NO CHARGE
CLM	Reviewed email from Mara Verheyden-Hilliard to Samantha Weaver	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed e-mail from Samantha Weaver to SS	0.10 \$475.00/hr	NO CHARGE
MVH	Drafted email to cocounsel re: transcript	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed email from Samantha Weaver to SS	0.10 \$475.00/hr	NO CHARGE
1/5/2017			
CLM	Reviewed transcript of client's deposition, annotating, and as against Acol's statements, also noting areas for next depositions and 30b6	1.90 \$475.00/hr	902.50
CLM	Drafted 30(b)(6) topics, identified deponents for deposition, reviewed related materials	2.10 \$475.00/hr	997.50
SS	Review of emails between attorneys re: subpoenas for additional depositions	0.10 \$150.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/5/2017			
CLM	Reviewed email from Leah Watson	0.10 \$475.00/hr	NO CHARGE
1/6/2017			
CLM	Sent email to Leah Watson re: scheduling	0.10 \$475.00/hr	NO CHARGE
SS	Review of emails between attorneys re: subpoenas for additional depositions	0.10 \$150.00/hr	NO CHARGE
CLM	Research, case law research on searches and seizures, reasonableness of strip or body cavity searches and Acol's claimed defenses	3.20 \$475.00/hr	1,520.00
CLM	Drafted email to co-counsels re: witnesses for additional depositions	0.30 \$475.00/hr	142.50
CLM	Reviewed email from Leah Watson re: 30(b)(6) deposition	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed email from Leah Watson re: 30(b)(6) deposition and deficiencies	0.10 \$475.00/hr	47.50
CLM	Drafted list of proposed additional deponents based on Acol's defense claims in deposition compared to documents in discovery, related doc review as to evidence available	3.30 \$475.00/hr	1,567.50
1/10/2017			
CLM	Reviewed e-transmission from Leah Watson to Opposing Counsel	0.10 \$475.00/hr	NO CHARGE
1/11/2017			
CLM	Reviewed email from Leah Watson	0.10 \$475.00/hr	NO CHARGE
SS	Review of emails between attorneys re: subpoenas for additional depositions	0.10 \$150.00/hr	NO CHARGE
CLM	Reviewed email from Leah Watson	0.10 \$475.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/11/2017			
CLM	Reviewed email from Leah Watson	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed email from Opposing Counsel re: Houck depo	0.10 \$475.00/hr	NO CHARGE
CLM	Drafted email to Leah Watson re: depositions	0.10 \$475.00/hr	47.50
CLM	Reviewed email from Leah Watson	0.10 \$475.00/hr	NO CHARGE
1/12/2017			
CLM	Reviewed e-mail from Leah Watson	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed email from Mara Verheyden-Hilliard re: additional depositions	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed e-mail from Corkery re: Notice of Records Deposition	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed email from Mara Verheyden-Hilliard to Corkery re: Notice of Records Deposition	0.10 \$475.00/hr	NO CHARGE
SS	Receipt, scanning, filing, circulation to attorneys and calendaring of of Notice of Records Depo	0.10 \$150.00/hr	NO CHARGE
CLM	Reviewed second e-mail response from Opposing Counsel reasserting objections to additional depositions	0.10 \$475.00/hr	47.50
CLM	Drafted second email letter to Opposing Counsel regarding relevancy of depositions and requesting alternate dates for deponents	0.10 \$475.00/hr	47.50
CLM	Reviewed letter from Opposing Counsel	0.10 \$475.00/hr	47.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/17/2017			
CLM	Sent e-mail to Leah Watson re: Houck deposition	0.10 \$475.00/hr	47.50
CLM	Reviewed email from Leah Watson	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed email from Corkery to Karp transmitting notice of deposition of Officer Houck	0.10 \$475.00/hr	NO CHARGE
SS	Review and filing of Notice of Deposition for Houck (prepared and transmitted by Dennis Corkery)	0.10 \$150.00/hr	NO CHARGE
1/30/2017			
CLM	Reviewed email from Opposing Counsel re: scheduling depositions	0.10 \$475.00/hr	NO CHARGE
1/31/2017			
SS	Initial prep for Houck depo	0.30 \$150.00/hr	45.00
2/1/2017			
SS	Prep for Houck depo	0.50 \$150.00/hr	75.00
2/2/2017			
CLM	Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
SS	Calendaring of upcoming depositions	0.10 \$150.00/hr	NO CHARGE
CLM	Preparation for deposition of Officer Houck; further review of Acol's deposition and its annotations; review of audio statements of both Houck and Acol and ROI; drafting of questions; incorporation of legal standards and areas of inquiry from research by Mara Verheyden-Hilliard	6.20 \$475.00/hr	2,945.00
MVH	Research, legal obligations and appropriate standards, including updating case law research re failure to intervene, bystander liability standards of proof, for tomorrow's deposition of Officer Houck	2.80 \$475.00/hr	1,330.00
SS	Prep for Houck depo, research and identify relevant materials at attorneys request	1.00 \$150.00/hr	150.00

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	<u>Hrs/Rate</u>	<u>Amount</u>
2/2/2017		
SS Preparation of exhibits requested by Carl Messineo for Houck deposition	0.90 \$150.00/hr	135.00
CLM draft email to co-counsels re: depositions of denoiun and barry	0.10 \$475.00/hr	47.50
2/3/2017		
MVH Phone call w/ Carl Messineo re: Houck deposition after depo	0.40 \$475.00/hr	NO CHARGE
CLM Phone call w/ Mara Verheyden-Hilliard re: Houck deposition after depo	0.40 \$475.00/hr	190.00
CLM Deposition of defendant Houck (2hours examination, .5 waiting, 3/4 hour transportation there and 30 minutes on return)	3.10 \$475.00/hr	1,472.50
CLM Reviewed email from Corkery to Karp re: depo notices	0.10 \$475.00/hr	NO CHARGE
2/13/2017		
CLM sent email to Sarah Sloan re: materials to be prepared for the depositions on Thursday (Barry, Derouin)	0.10 \$475.00/hr	47.50
SS Review instructions from attorney re: prep for Deroiu and Barry depositions	0.10 \$150.00/hr	15.00
2/14/2017		
CLM Preparation for deposition of Corporal Barry, including review of Acol's deposition and its annotations, FTO training materials, audio statements by officers for ROI, ROI, and related materials; drafting of questions	5.00 \$475.00/hr	2,375.00
SS Assist attorney in preparing for Deroiu and Barry depositions	0.50 \$150.00/hr	75.00
2/15/2017		
CLM Preparation for deposition of training officer Derouin	3.50 \$475.00/hr	1,662.50
SS Preparation of exhibits and materials for Deroiu and Barry depositions	1.50 \$150.00/hr	225.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/15/2017			
SS	Receive and file transcript from Houck depo	0.20 \$150.00/hr	NO CHARGE
	SS Assist attorney in preparing for Deroiu and Barry depositions	0.50 \$150.00/hr	75.00
2/16/2017			
CLM	Depositions of Deroiu and Barry, including travel	4.20 \$475.00/hr	1,995.00
MVH	phone call w/ Carl Messineo re: depositions of Deroiu and Barry after depo	0.30 \$475.00/hr	NO CHARGE
CLM	Phone call w/ Mara Verheyden-Hilliard re: Deroiu and Barry after depo	0.30 \$475.00/hr	142.50
	No Charge	9.10	\$4,030.00
	Billable Fees	104.00	\$39,682.50

Litigation phase: Motions Practice

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
	<u>Motions Practice</u>		
10/20/2015			
CLM	Reviewed email from Corkery and Opposing Counsel ltr re: MTD	0.20 \$475.00/hr	NO CHARGE
10/28/2015			
CLM	Meeting with WLC co-counsel by phone re: Motion to dismiss	1.00 \$475.00/hr	475.00
1/4/2016			
CLM	Reviewed email from Corkery re: MTD	0.10 \$475.00/hr	47.50
1/7/2016			
CLM	Reviewed annotated documents, Defendant's Motion to Dismiss	0.50 \$475.00/hr	237.50
1/8/2016			
CLM	Phone call with Corkery re: Defendant's Motion to Dismiss	0.50 \$475.00/hr	237.50
1/27/2016			
CLM	Reviewed email from Corkery re: opp to MTD	0.10 \$475.00/hr	NO CHARGE
1/28/2016			
CLM	Reviewed documents, draft opposition to motion to dismiss (.4 hours), researched related case law on what state action constitutes objectively	1.10 \$475.00/hr	522.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
	reasonable deterrence from engaging in First Amendment protected activities, drafting e-mail to co-counsel with additional language regarding same		
1/28/2016			
CLM	Reviewed email from Handley re: MTD	0.10 \$475.00/hr	NO CHARGE
	CLM Reviewed email from Corkery re: MTD	0.10 \$475.00/hr	NO CHARGE
8/23/2016			
MVH	Reviewed documents, email from DCorkery and court ruling	0.40 \$475.00/hr	190.00
	CLM Reviewed documents email from cocounsel and review and annotated court ruling	0.60 \$475.00/hr	285.00
10/25/2016			
CLM	Drafted / edited motion to amend scheduling order provided by Dennis	0.30 \$475.00/hr	142.50
	CLM Phone call with Mara Verheyden-Hilliard re: amending scheduling order`	0.20 \$475.00/hr	95.00
	CLM Legal Research, Fourth Circuit standards for good cause to amend scheduling order	0.40 \$475.00/hr	190.00
	MVH phone call w/ Carl Messineo re: amending scheduling order and review of draft	0.30 \$475.00/hr	NO CHARGE
11/9/2016			
CLM	review Opposing Counsel detailed response to deficiency letter, maintaining position as to many items including ROI, annotated for preparation of outline for motion to compel	1.80 \$475.00/hr	855.00
11/16/2016			
SS	Preparation of materials for attorney for work in discovery, materials attorney needs for motion to compel	0.30 \$150.00/hr	45.00
11/18/2016			
CLM	Preparation of materials in support of request to file motion to compel letter	0.60 \$475.00/hr	285.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
11/29/2016	MVH Research case law discovery of narrative report of ROI and similar claimed internal memos nationally and in Circuit	1.40 \$475.00/hr	665.00
12/1/2016	CLM Drafted letter motion to compel re: ROI, including related legal research	2.90 \$475.00/hr	1,377.50
	SS Prep for filing letter brief	0.50 \$150.00/hr	75.00
12/20/2016	SS Filing reply letter on discovery dispute (only stating objection dropped)	0.30 \$150.00/hr	45.00
1/3/2017	CLM Meeting by telephone to discuss strategy with co-counsels re: discovery issues that may be issues of motions	0.50 \$475.00/hr	237.50
	MVH Meeting by telephone to discuss strategy with co-counsels re: discovery issues that may be issues of motions	0.50 \$475.00/hr	237.50
1/11/2017	SS Review and filing of Letter Motion filed by Karp (ECF No. 46)	0.10 \$150.00/hr	NO CHARGE
1/12/2017	MVH Phone call w/ Carl Messineo re: letter to Opposing Counsel re: discovery issues	0.20 \$475.00/hr	NO CHARGE
1/13/2017	SS Preparation and filing of Request for Conference (ECF No. 49)	0.50 \$150.00/hr	75.00
	CLM Drafted letter to Judge grimm for premotion conference call regarding 3 issues: Pl's Request to Amend Complaint; Depositions sought by Plaintiff and refused by Defendants; Motion to Compel substantive responses over the directives for Officer Acol to not answer questions related to personal assets	2.00 \$475.00/hr	950.00
	CLM Drafted / incorporated edits from Leah Watson and Mara Verheyden-Hilliard into letter seeking premotion conference call with Court	0.10 \$475.00/hr	47.50
	MVH Reviewed / edited draft letter seeking pre-motion conference re: discovery issues	0.30 \$475.00/hr	142.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/13/2017			
CLM	Review email from Leah Watson with edit to draft pre-motion conference letter to the Court	0.10 \$475.00/hr	NO CHARGE
	CLM Reviewed documents, Order from Court re: pre-motion telephone conference (for 1/24/217 at 4 pm) at initiative of defendant	0.10 \$475.00/hr	47.50
1/26/2017			
CLM	emails w/ cocounsel re: status report and potential motion summary judgment issues to the Court	0.10 \$475.00/hr	47.50
2/3/2017			
CLM	Reviewed email from Corkery w/ draft status report and draft msj ltr	0.20 \$475.00/hr	NO CHARGE
2/4/2017			
CLM	Research, review of cases adjudicating lawfulness of frisks and strip searches	0.80 \$475.00/hr	380.00
	CLM Phone call with Mara Verheyden-Hilliard re: possible changes to the MSJ letter	0.30 \$475.00/hr	142.50
	MVH Phone call with Carl Messineo re: possible changes to the MSJ letter	0.30 \$475.00/hr	NO CHARGE
	CLM Reviewed documents, deposition of Acol and Report of Investigation, portions of Acol's verbal statement to Corporal Barry, and materials in discovery production, in preparation for proposed revisions to the MSJ letter	2.20 \$475.00/hr	1,045.00
2/5/2017			
CLM	Drafted revisions to the letter to the Court (pursuant to 9/13/16 minute order) setting forth factual and legal grounds to move for summary judgment as to liability on Count III	1.50 \$475.00/hr	712.50
2/28/2017			
CLM	Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
No Charge		1.80	\$822.50
Billable Fees		21.80	\$9,835.00

Litigation phase: Attending Court Hearings

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
	<u>Attending Court Hearings</u>		
10/27/2015			
CLM	Review e-mail from Corkery re: court hearing	0.10 \$475.00/hr	NO CHARGE
11/2/2015			
CLM	Reviewed email from Corkery re: court call	0.10 \$475.00/hr	NO CHARGE
	CLM Reviewed e-mail from Corkery re: court hearing	0.10 \$475.00/hr	NO CHARGE
11/3/2015			
CLM	Court Appearance for Hearing, pre-motion conference call with Court on defendant's motion to dismiss	0.40 \$475.00/hr	NO CHARGE
	CLM Reviewed email from co-counsels re: hearing, next steps	0.20 \$475.00/hr	95.00
	CLM sent email to co-counsels re: court call	0.10 \$475.00/hr	NO CHARGE
	CLM Preparation for Hearing, pre-motion conference call with Court on defendant's motion to dismiss	0.30 \$475.00/hr	142.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
9/13/2016			
CLM	Conference call with court (Mara Verheyden-Hilliard also)	0.50 \$475.00/hr	NO CHARGE
MVH	Phone call with WLC counsel re: call to court	0.20 \$475.00/hr	NO CHARGE
CLM	Phone call w/ WLC re: call to court	0.20 \$475.00/hr	95.00
MVH	Phone call w/ Carl Messineo re: conference call w/ court	0.10 \$475.00/hr	47.50
MVH	Conference with Court, Carl Messineo, Corkery, Karp	0.50 \$475.00/hr	237.50
CLM	Phone call w/ Mara Verheyden-Hilliard re: conference call w/ court	0.10 \$475.00/hr	47.50
11/21/2016			
CLM	Court Appearance for Hearing by telephone with court	0.30 \$475.00/hr	142.50
CLM	Preparation for court tele-conference	0.40 \$475.00/hr	190.00
MVH	Phone call w/ Carl Messineo re: hearing w/ court	0.10 \$475.00/hr	NO CHARGE
CLM	Phone call w/ Mara Verheyden-Hilliard re: court hearing	0.10 \$475.00/hr	47.50
1/13/2017			
SS	Calendaring of telephone conference with Court	0.10 \$150.00/hr	NO CHARGE
1/19/2017			
CLM	Reviewed e-mail from Opposing Counsel re: scheduling	0.10 \$475.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/19/2017			
CLM	Reviewed email from Corkery re: request from Opposing Counsel to move the pre-motion conference hearing	0.10 \$475.00/hr	NO CHARGE
1/25/2017			
CLM	Court Appearance for Hearing by telephone	0.50 \$475.00/hr	237.50
	CLM Preparation for conference call hearing with Court, including review of correspondence and materials and outlining key points	0.40 \$475.00/hr	190.00
2/6/2017			
SS	Review and filing of Status Reports (ECF Nov. 55 and 56)	0.10 \$150.00/hr	NO CHARGE
2/10/2017			
SS	Calendaring telephone status conference (ECF No. 58)	0.10 \$150.00/hr	NO CHARGE
	No Charge	2.10	\$900.00
	Billable Fees	3.10	\$1,472.50

Litigation phase: ADR

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
	<u>ADR</u>		
10/7/2016			
CLM	Reviewed email from Corkery re: settlement position	0.10 \$475.00/hr	47.50
10/11/2016			
MVH	Drafted communication to Corkery regarding settlement posture	0.10 \$475.00/hr	47.50
CLM	Reviwed email from Corkery re: settlement	0.10 \$475.00/hr	NO CHARGE
MVH	Drafted email to co-counsels re: settlement position	0.10 \$475.00/hr	47.50
CLM	reviewed email from Mara Verheyden-Hilliard to co-counsels	0.10 \$475.00/hr	NO CHARGE
MVH	Reviewed email from Corkery re: settlement	0.10 \$475.00/hr	NO CHARGE
MVH	Reviewed email from Corkery re: conversation w/ client and settlement	0.10 \$475.00/hr	47.50

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	<u>Hrs/Rate</u>	<u>Amount</u>
10/11/2016		
CLM reviewed email from Corkery re: settlement position	0.10 \$475.00/hr	47.50
CLM Reviewed email from Corkery re: settlement posture	0.10 \$475.00/hr	NO CHARGE
MVH Reviewed email from Corkery to Karp re: settlement position	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Corkery to Karp re: settlement position	0.10 \$475.00/hr	NO CHARGE
MVH research and discussions with Carl Messineo re: settlement posture, updated review of other strip search cases	1.00 \$475.00/hr	475.00
CLM discussions with Mara Verheyden-Hilliard re: settlement posture including case verdict/settlement survey	0.50 \$475.00/hr	237.50
10/21/2016		
MVH email w/ co counsel WCL re: settlement posture	0.10 \$475.00/hr	47.50
12/7/2016		
MVH Research published strip search verdicts and settlements nationally, including email inquiries with colleagues for additional information	1.70 \$475.00/hr	807.50
1/9/2017		
MVH E-communication to cocounsel re: strip search settlement	0.10 \$475.00/hr	47.50
MVH Research, settlements and verdicts in strip search cases	1.50 \$475.00/hr	712.50
CLM Review email from Mara Verheyden-Hilliard re: settlement	0.10 \$475.00/hr	NO CHARGE
1/11/2017		
CLM emails w/ Corkery re: mediation	0.10 \$475.00/hr	47.50

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	<u>Hrs/Rate</u>	<u>Amount</u>
1/17/2017		
MVH E-communication to cocounsel re: settlement posture and relevant cases	0.10 \$475.00/hr	47.50
1/18/2017		
CLM Received email from Corkery	0.10 \$475.00/hr	NO CHARGE
1/23/2017		
CLM Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Corkery to Chambers of Judge Sullivan	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed e-mail transmission of demand to Opposing Counsel by Corkery	0.10 \$475.00/hr	NO CHARGE
MVH Sent email to Corkery re: mediation statement	0.10 \$475.00/hr	47.50
CLM Drafted email to Corkery and Watson	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed email from Mara Verheyden-Hilliard to Corkery	0.10 \$475.00/hr	NO CHARGE
CLM Drafted / edited mediation statement	1.50 \$475.00/hr	712.50
MVH E-communication to cocounsel Corkery re: settlement demand	0.10 \$475.00/hr	47.50
MVH Drafted, edited mediation statement	0.70 \$475.00/hr	332.50
1/25/2017		
SS Communication with CM, MVH and Samantha Weaver about scheduling meeting with client	0.10 \$150.00/hr	NO CHARGE

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	<u>Hrs/Rate</u>	<u>Amount</u>
1/30/2017		
CLM Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
CLM Reviewed counter-offer from Opposing Counsel	0.10 \$475.00/hr	47.50
MVH Research other cases involving officers in Laurel and in jurisdiction	0.80 \$475.00/hr	380.00
1/31/2017		
MVH Meeting w/ client, Carl Messineo Sarah Sloan, WCL: DC, LW, SW and Sergeant re: discussion as to mediation	1.40 \$475.00/hr	665.00
2/3/2017		
MVH E-communication w/ cocounsel re: phone call w/ client	0.10 \$475.00/hr	NO CHARGE
MVH Phone call to cocounsel Corkery re: phone call w/ client	0.10 \$475.00/hr	47.50
MVH Phone call w/ client re: mediation and settlement positions	0.30 \$475.00/hr	142.50
SS Assist attorneys in preparation for Settlement Conference	0.50 \$150.00/hr	75.00
2/6/2017		
CLM Mediation session, travel time at 50% (45 minutes / 30 minutes)	0.60 \$475.00/hr	NO CHARGE
MVH Mediation session with Judge Sullivan at courthouse	2.90 \$475.00/hr	1,377.50
MVH Mediation session, travel time 1/2 hour each way billed at half rate	0.50 \$475.00/hr	237.50
MVH Phone call, discussion w/ Carl Messineo re: mediation and status of case,	0.40 \$475.00/hr	190.00

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	<u>Hrs/Rate</u>	<u>Amount</u>
2/6/2017		
CLM Mediation session	2.90 \$475.00/hr	NO CHARGE
2/15/2017		
CLM Reviewed email from Corkery re: R68	0.10 \$475.00/hr	NO CHARGE
CLM emails w/ corkery re: r68	0.10 \$475.00/hr	47.50
CLM Phone call with Dennis Corkery re: Offer of Judgment	0.20 \$475.00/hr	NO CHARGE
MVH Reviewed documents, R 68 offer	0.10 \$475.00/hr	NO CHARGE
MVH Phone call w/ Carl Messineo re: R68 offer and case re: whether to recommend	0.40 \$475.00/hr	190.00
CLM Phone call with Mara Verheyden-Hilliard re: Offer of Judgment	0.40 \$475.00/hr	NO CHARGE
CLM Detailed Review Offer of Judgment	0.20 \$475.00/hr	95.00
2/16/2017		
CLM Sent email to co-counsels re: offer of judgment	0.10 \$475.00/hr	47.50
2/20/2017		
CLM Phone call with Mara Verheyden-Hilliard and Corkery re: meeting tomorrow with client	0.30 \$475.00/hr	142.50
MVH Phone call with Carl Messineo and Corkery re: meeting tomorrow with client	0.30 \$475.00/hr	NO CHARGE
2/21/2017		
SS Preparations for meeting with client Feb. 22 re: R68	0.10 \$150.00/hr	15.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/21/2017			
MVH	Phone call w/ Carl Messineo and Dennis Corkery, atty conference re: R68 offer and whether to recommend	0.50 \$475.00/hr	237.50
2/22/2017			
SS	Assist attorneys prior to meeting with client	0.20 \$150.00/hr	30.00
MVH	Research, brief re: fees and R68, email to cocounsel re: same	0.40 \$475.00/hr	190.00
SS	Communication with client by phone	0.10 \$150.00/hr	15.00
MVH	Meeting w/ Carl Messineo and DCorkery post meeting w/ client to discuss R68, next steps, fee petition, communications w/ court and Opposing Counsel	0.40 \$475.00/hr	190.00
CLM	Meeting w/ Mara Verheyden-Hilliard and DCorkery post meeting w/ client to discuss R68, next steps, fee petition, communications w/ court and Opposing Counsel	0.40 \$475.00/hr	190.00
SS	Draft Notice re: Offer of Judgment for client	0.30 \$150.00/hr	45.00
2/28/2017			
CLM	Reviewed email from Opposing Counsel	0.10 \$475.00/hr	NO CHARGE
SS	Communication with client by phone re: settlement	0.10 \$150.00/hr	15.00
CLM	Reviewed email from Opposing Counsel to Corkery re: r68 execution	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed e-mail from Corkery to Opposing Counsel	0.10 \$475.00/hr	NO CHARGE
CLM	Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/28/2017			
SS	Meeting with client re: settlement and execution of materials	0.20 \$150.00/hr	30.00
SS	Communication with paralegal Samantha Weaver about W-9	0.10 \$150.00/hr	NO CHARGE
SS	Assist client in completion of W-9	0.10 \$150.00/hr	15.00
3/21/2017			
SS	Phone call w/ client re: judgment entered	0.10 \$150.00/hr	15.00
3/31/2017			
SS	Meeting w/ client, including delivery of check; also email to counsel re: same	0.20 \$150.00/hr	30.00
CLM	E-communications w/ corkery re: satisfaction of judgment	0.10 \$475.00/hr	NO CHARGE
4/1/2017			
CLM	Executed and transmitted satisfaction of judgment	0.20 \$475.00/hr	NO CHARGE
		No Charge	7.00
		Billable Fees	19.20
			\$3,260
			\$8,502.50

Litigation phase: Fee Petition Preparation

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
<u>Fee Petition Preparation</u>		
12/14/2015 CLM Reviewed email from Corkery re: fee statement	0.10 \$475.00/hr	NO CHARGE
12/16/2015 CLM Reviewed email from Corkery re: fees	0.10 \$475.00/hr	NO CHARGE
12/18/2015 CLM Sent e-mail to Corkery re: fees	0.10 \$475.00/hr	NO CHARGE
CLM Preparation of estimated fees to date, including review and exercise of billing discretion	0.90 \$475.00/hr	427.50
1/28/2016 CLM Review of fees for quarterly statement, billing discretion	0.20 \$475.00/hr	95.00
4/11/2016 CLM Preparation, review of hours for quarterly fee statement	0.10 \$475.00/hr	47.50
10/4/2016 MVH reviewed and responded to email w/ cocounsel corkery re: fees	0.10 \$475.00/hr	47.50

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	<u>Hrs/Rate</u>	<u>Amount</u>
10/4/2016 CLM reviewed email from co-counsel re: fees	0.10 \$475.00/hr	47.50
10/6/2016 MVH Reviewed documents, billing records for quarterly fee statement, exercise of billing discretion for calculation; email to cocounsel re: same	1.00 \$475.00/hr	475.00
1/17/2017 CLM Reviewed documents, fees for 4th quarter 2016	1.60 \$475.00/hr	760.00
MVH Reviewed documents, fees for 4th quarter 2016 for quarterly submission,	0.70 \$475.00/hr	332.50
2/22/2017 MVH Meeting w/ client, Carl Messineo and DCorkery re: R68 discussion	1.30 \$475.00/hr	NO CHARGE
CLM Meeting w/ client, Mara Verheyden-Hilliard and DCorkery re: R68 discussion	1.30 \$475.00/hr	617.50
2/23/2017 CLM Reviewed email from Corkery	0.10 \$475.00/hr	NO CHARGE
3/13/2017 MVH E-communications w/ Corkery re: attorneys fees motion and related matters	0.10 \$475.00/hr	47.50
MVH Initial review billing records to exercise billing discretion, identify categories for N/C, email Corkery re: areas of n/c	0.70 \$475.00/hr	332.50
3/27/2017 MVH E-communications w/ Corkery re: attorneys fees motion	0.10 \$475.00/hr	47.50
4/4/2017 MVH Phone call w/ Carl Messineo re: attorneys fees filing and itemization matters	0.20 \$475.00/hr	95.00
CLM Phone call w/ Mara Verheyden-Hilliard re: attorneys fees filing coordination of itemization matters	0.20 \$475.00/hr	95.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/4/2017			
MVH	Phone call w/ Corkery re: attorneys fees filing coordination and email same	0.10 \$475.00/hr	47.50
4/6/2017			
SS	Reviewed documents, notes and records regarding client's efforts to obtain counsel	0.40 \$150.00/hr	60.00
MVH	Reviewed documents, itemizations, prepared billing records, removed work product information, no billed entries for billing discretion	5.20 \$475.00/hr	2,470.00
SS	Meeting w/ Mara Verheyden-Hilliard re: affidavit from client for fee petition	0.10 \$150.00/hr	15.00
MVH	Meeting w/ Sarah Sloan paralegal re: affidavit from client for fee petition	0.10 \$475.00/hr	47.50
4/11/2017			
MVH	Reviewed documents for 1Q 2017 fee statement; sent email to WLC Corkery re: same	0.40 \$475.00/hr	190.00
MVH	multiple emails w/ WLC Corkery on coordination of fee petition records and memo	0.10 \$475.00/hr	47.50
MVH	Drafted and edited Memo in support of fee petition, including nature and facts of the case and areas of litigation required by defendant's chosen course of conduct in litigation, related case law research	4.40 \$475.00/hr	2,090.00
4/12/2017			
CLM	Meeting w/ Mara Verheyden-Hilliard re: memo drafting and adding Acol's Answer specifics	0.10 \$475.00/hr	NO CHARGE
MVH	Meeting w/ Carl Messineo re: memo drafting coordination and his area of work	0.10 \$475.00/hr	47.50
MVH	Preparation of itemized billing records for PCJF, continued review for removal of work product and no charging of items exercising billing discretion	3.50 \$475.00/hr	NO CHARGE
MVH	Drafted, edited memo in support of fee petition, including DMD case citations for standards of review	2.30 \$475.00/hr	1,092.50

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/12/2017			
CLM	Drafted edited memo in support of fee petition, including review of Acol's Answer and tracking denials against known facts	1.20 \$475.00/hr	570.00
4/13/2017			
MVH	Multiple emails w/ WLC Corkery re: coordination of fee records for joint submission, discussion of billing discretion	0.10 \$475.00/hr	47.50
	SS Phone call w client re: affidavit and efforts to secure attorney	0.10 \$150.00/hr	15.00
	MVH Preparation of itemized billing records, categorizing by DMd Appendix areas of work, continued exercise of billing discretion, segregation	1.50 \$475.00/hr	712.50
4/14/2017			
MVH	Drafted, edited fee memo, reasonableness of hours and rates, course of litigation, related case law research and inclusion	6.10 \$475.00/hr	2,897.50
4/17/2017			
MVH	Preparation fee petition, insertion of PCJF hours into memo charts, drafting memo details as to categories of work,	5.50 \$475.00/hr	2,612.50
	SS Drafted outline client affidavit for review	0.20 \$150.00/hr	30.00
4/18/2017			
CLM	Drafted section of memo, areas of work and necessity re discovery and depositions, reviewed related documents	1.50 \$475.00/hr	712.50
	MVH Reviewed documents, draft declaration by WLC and firm on market rates	0.20 \$475.00/hr	NO CHARGE
	MVH Meeting w/ Sarah Sloan re: final fee petition items to do	0.20 \$475.00/hr	95.00
	SS Meeting w/ Mara Verheyden-Hilliard re: final fee petition items to do	0.20 \$150.00/hr	30.00
	CLM Phone call w/ Mara Verheyden-Hilliard re: outstanding fee petition items for coordination	0.40 \$475.00/hr	NO CHARGE

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/18/2017			
MVH	Phone call w/ Carl Messineo re: outanding fee petition items for inclusion, coordination of work	0.40 \$475.00/hr	190.00
MVH	Preparation of itemization and review of billing entries for final submission and totals	2.10 \$475.00/hr	997.50
MVH	Drafted, edited client affidavit for his reivew	0.20 \$475.00/hr	95.00
MVH	Drafted affidavits for self and Carl Messineo, reviewed current market rates information for inclusion	1.50 \$475.00/hr	712.50
4/19/2017			
SS	Preparation of itemization, configuring itemization printouts to conform to Appendix B with additional totalling of no-charged and billablehours and amounts	2.30 \$150.00/hr	345.00
SS	Preparation of PCJF final of memo and affidavits, final proofing edits, cross checking numbers, and formatting for transmission to WLC	3.30 \$150.00/hr	495.00
MVH	Drafted final edits to memo, inclusion of sections from affidavits and references and final numbers for tables	4.20 \$475.00/hr	1,995.00
MVH	Phone call w/ Carl Messineo re: coordination re: final fee petition items	0.20 \$475.00/hr	NO CHARGE
CLM	Phone call w/ Mara Verheyden-Hilliard re: coordination of final fee petition items	0.20 \$475.00/hr	NO CHARGE
MVH	Meeting w/ Sarah Sloan re: format of itemization issues	0.20 \$475.00/hr	NO CHARGE
	No Charge	6.50	\$3,087.50
	Billable Fees	51.10	\$22,127.50